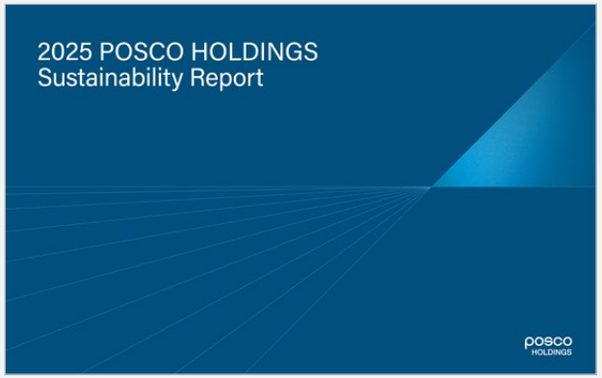
2025 POSCO HOLDINGS Sustainability Report

posco HOLDINGS

About This Report

POSCO Holdings is proud to present its 2025 sustainability report outlining its commitment, strategy, and performance in advancing sustainability and ESG management. Prepared in line with global ESG disclosure standards, this report is structured around POSCO group's mid- to long-term strategies and goals, operational updates, and ESG achievements. Going forward, POSCO Holdings aims to transparently disclose POSCO group's key ESG opportunities and risks from the viewpoint of its stakeholders to ensure proactive communication.



COVER STORY

The horizontally expanding line structure symbolizes the material technologies and industrial foundation that POSCO Holdings has built around steel. The lines moving in the same direction illustrate how individual technologies and business capabilities converge into one current and form a new point of transition. They visually capture POSCO Holdings' future blueprint as it expands from steel into rechargeable battery materials and energy.

Reporting Standard

This report was prepared in accordance with the GRI (Global Reporting Initiative) Standards, the international guidelines for sustainability reporting. As a member of the UN Global Compact (UNGC), POSCO group has included in this report its implementation activities in support of the Ten Principles on human rights, labor, the environment, and anti-corruption, as well as the UN Sustainable Development Goals (SDGs). The financial information presented in this report has been prepared in accordance with Korean International Financial Reporting Standards (K-IFRS). ESG disclosures have been prepared with reference to the Sustainability Accounting Standards Board (SASB) industry-specific standards and the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

Reporting Scope

This report presents quantitative data and qualitative performance of POSCO Holdings, its major domestic business sites and major overseas steel subsidiaries.* Please note that disclosure items for environmental and social quantitative data may differ between domestic business sites and major overseas steel subsidiaries. Quantitative data for major overseas steel subsidiaries is disclosed separately on a consolidated basis.

Reporting Period

This report primarily covers the performance of POSCO Holdings, POSCO group's key operating companies, and major overseas steel subsidiaries for the period from January 1 to December 31, 2025. Certain information also includes performance from the first half of 2026.

Reporting Cycle

Annual (Release date of previous report: June 2025)

Assurance

To ensure the credibility of the reporting process and the information contained herein, POSCO Holdings engaged KPMG Samjong Accounting Corp., an independent assurance practitioner, to perform assurance engagement. The assurance engagement was conducted in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other Than Audits or Reviews of Historical Financial Information.

Disclaimer

This report contains forward-looking statements that reflect POSCO Holdings' current outlook and strategy as well as predictions for its future sustainability and ESG performance. These statements should be considered in light of various potential factors and uncertainties that may arise in the future. Consequently, actual outcomes may differ from these projections, and POSCO Holdings assumes no obligation to update or revise such forward-looking statements.

References

- POSCO Holdings Business Report
- POSCO Holdings Auditor's Report
- POSCO Holdings Governance Report
- POSCO Holdings Form 20-F
- POSCO Holdings IR Archives
- POSCO group's Sustainability Report
- POSCO Newsroom

Report Distribution and Feedback

This report is downloadable on the POSCO Holdings' website. For feedback or inquiries about its content, please contact us below:

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* Major operating companies (10 companies): POSCO HOLDINGS, POSCO, POSCO INTERNATIONAL, POSCO E&C, POSCO FUTURE M, POSCO DX, POSCO FLOW, POSCO STEELEON, POSCO Mobility Solution, POSCO M-TECH
** Major overseas steel subsidiaries (4 companies): PT.Krakatau POSCO (Indonesia), POSCO Yamato Vina Steel (Vietnam), POSCO Maharashtra Steel (India), POSCO Thainox (Thailand)

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View of Park1538, the promotional center at Gwangyang Works

CEO Message

“Materials for Tomorrow, Innovation for Excellence”

Dear esteemed stakeholders,

The global business environment has become more uncertain due to rising protectionism and the associated geopolitical risks. Competition is intensifying across industries while the evolution of digital technologies, e.g., artificial intelligence (AI), demands an overhaul of existing operating practices and business systems. Moreover, countries around the world are introducing new policies and regulations to address climate change and means to protect human rights across the supply chain, against mounting pressures to be accountable to social and environmental mandates. Hence, building reliable information management systems has become even more crucial.

Although the compounded changes may appear daunting, they can also present new opportunities. To achieve our goal to be “world-class,” as a business group, POSCO fends off volatility and continues to propel innovation. Through enhanced operational competitiveness and ESG management, we will not be deterred in our quest to build the foundation of sustainable growth.

Safety, Where World-Class Excellence Begins

For POSCO group, true “world-class excellence” begins by guaranteeing “safety.” Safety is our utmost priority and a value that cannot be traded with any other. In fact, safety is an uncompromising principle that is incorporated into all aspects of our operational management; hence, our safety management framework is relentlessly monitored and refined across all facilities, systems, and organizations. Furthermore, we will share our workplace safety knowhow with our suppliers and partners to apply the skills throughout the value chain. By upgrading our capability and harnessing AI to predict risks and monitor facilities, we intend to model K-SAFETY, the ultimate Korean standard of workplace safety.

Fortifying our Business Portfolio

Our growth drivers have been fortified by adding Rechargeable Battery Materials and Energy sectors to the scope of our business that began with Steelmaking. In Steel, we will pursue an end-to-end localization strategy in high-growth markets, i.e., India, North America, to drive continued success. Additionally, we intend to set the carbon-neutrality technology standard by delivering on the Gwangyang electric arc furnace (EAF) and the HyREX demonstration plant that will assess POSCO’s proprietary hydrogen reduction ironmaking technology.

Finally, we will extend our native competencies to build a positive growth loop, whereby profits from overseas expansion will feed into domestic decarbonization efforts, thereby ensuring our mid- to long-term success. In the Rechargeable Battery Materials sector, we aim to enhance our cost and quality competitiveness through early acquisition of vital resources, e.g., lithium, and by ramping up our global plants to stable operations. Additionally, diverse base of customers and partnership with global automobile and battery-makers will beef up our next-generation technology development. In Energy, our focus is on the liquefied natural gas (LNG) value chain; we will increase LNG trading capability, build a second processing terminal, and introduce LNG-designated carriers. Moving forward, renewable energy, e.g., offshore wind, will be brought into our internal business mix, thereby forming another backbone of sustainable growth for the business group. The future demands carbon neutrality and energy transition. POSCO group answers that call by offering the requisite materials and industrial foundation through its Steel, Rechargeable Battery Materials and Energy sector businesses. The organic synergy generated by the 3 core sectors will catapult our status in the world to a group that represents humanity’s sustainable tomorrow.

Globally Recognized ESG Management Performance

In addition to bold changes made to our business portfolio, POSCO group’s ESG management practices are gaining global acclaim. Here are some highlights from 2025. Sustainalytics ranked us in the top 4% of global steel producers, crediting our management capability. Additionally, Morgan Stanley Capital International (MSCI) granted an ‘A’ rating, while the Korea Institute of Corporate Governance and Sustainability offered an “A+.” In addition to “Grade 1” registered in the S, G categories of the ISS ESG Quality Score, we were recognized as one of the top performers in the “Just Transition” category assessed by World Benchmarking Alliance (WBA) and made the outstanding company worldwide list for our noteworthy accomplishments.

Delivering on our ESG Management Pledge

The remarkable achievements notwithstanding, POSCO group will not rest on our laurels. We will continue to build on our ESG management skills. In addition to expanding our production bases for carbon-reduced products and developing low-carbon technologies, we will pursue low-carbon transition by balancing economic efficiency and technological feasibility. To comply with international standards, we will mandate ESG management throughout the supply chain and perform risk assessments to cover human rights and the ecological environment. Active communication with local communities, alongside ethical practices and legal compliance, will ensure diversity and inclusion, helping us retain the trust of our stakeholders.

As a global enterprise, we remain committed to making our foundation even stronger so that we can continue to seek growth that is sustainable. We aim for partnered growth with the community as a company that benefits the environment and society by offering a safe and fulfilling workplace.

To that end, I look forward to your unwavering attention and encouragement for POSCO group’s bold journey ahead. Thank you.

CHANG, In Hwa
Representative Director & CEO, POSCO HOLDINGS

Corporate Overview

General Overview

Name of Company

POSCO Holdings Inc. (Representative Directors: CHANG In Hwa, LEE Ju Tae)

(As of Mar. 2026)

Headquarters

6261, Donghaean-ro, Nam-gu, Pohang-si, Gyeongsangbuk-do, Republic of Korea

Listed Markets

Korea _ **KOSPI**

Overseas _ **New York Stock Exchange**

Subsidiaries

198 companies

(As of 2025-end)

Credit Ratings

(As of Feb. 2026)

S&P Global Rating	MOODY'S Rating
A-	Baa1
(Negative)	(Negative)

ESG Ratings

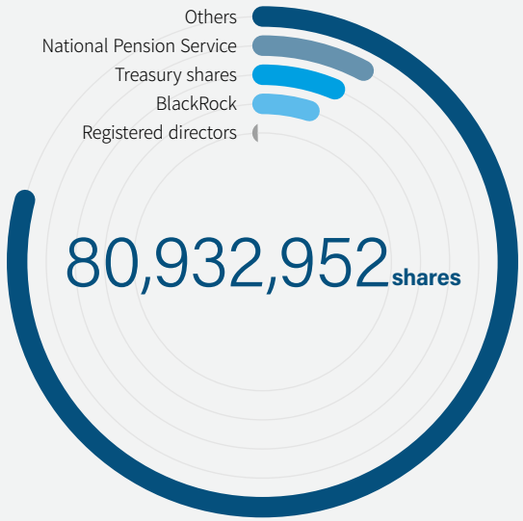
(As of Mar. 2026)

MSCI	Sustainalytics	ISS ESG	Korea Institute of Corporate Governance	World Benchmarking Alliance
A	Industry ESG Leader 2026	1 Quality Score Social and governance	A+	Outstanding company in the Just Transition category

Shareholding

(As of 2025-end)

Total shares outstanding



Others	National Pension Service
80.26%	7.96%
Treasury shares	**BlackRock[1)]**
6.56%	5.20%
Registered directors	
0.02%	

1) Based on the US SEC disclosure of BlackRock (Apr. 6, 2023)

Financial Information (consolidated)

Revenue	Operating Profit	ROE
KRW 69.1 trillion	KRW 1.8 trillion	0.8 %

Income Statement

(Unit: KRW trillion)

	2023	2024	2025
Revenue	77.1	72.7	**69.1**
Operating profit	3.5	2.2	**1.8**
Net income attributable to controlling interests	1.7	1.1	**0.7**

Financial Statement

(Unit: KRW trillion)

	2023	2024	2025
Assets	100.9	103.4	**105.2**
Liabilities	41.3	42.0	**42.8**
Equity	59.7	61.5	**62.4**

Key Financial Indicators

(Unit: %)

	2023	2024	2025
Net debt-to-equity ratio	13.5	18.2	**20.7**
ROE	3.1	1.6	**0.8**

Key Business

Listed Unlisted
(As of 2025-end)

POSCO HOLDINGS

Major Affiliates
(198 consolidated subsidiaries[1])

Key Metrics[2]

Overview

Steel

86 Entities

- POSCO — 100%
- POSCO STEELEON — 57%
- POSCO M-TECH — 49%
- KRAKATAU POSCO — 50%

Asset share: 55%

Revenue share: 51%

- POSCO: Rated No.1 by World Steel Dynamics, as the World's Most Competitive Steelmaker
- POSCO STEELEON: Galvanized steel, color-coated steel
- POSCO M-TECH: Steel product packaging, secondary steelmaking materials

Rechargeable Battery Materials

16 Entities

- POSCO FUTURE M — 58%
  - ultium cam — 85%
- POSCO Pilbara LITHIUM SOLUTION — 82%
- POSCO SILICON SOLUTION — 100%
- POSCO ARGENTINA — 100%
- POSCO GS Eco Materials — 70%
  - POSCO HY Clean Metal — 100%

Asset share: 15%

Revenue share: 3%

- POSCO FUTURE M: Only supplier of both cathode and anode materials in Korea
- POSCO ARGENTINA / POSCO Pilbara LITHIUM SOLUTION: Lithium hydroxide manufacturing
- POSCO HY Clean Metal: Lithium, nickel, and cobalt extraction

Infrastructure

74 Entities

- POSCO INTERNATIONAL — 73%
  - POSCO MOBILITY SOLUTION — 100%
- POSCO E&C — 53%
- POSCO DX — 65%

Asset share: 30%

Revenue share: 46%

- POSCO INTERNATIONAL: Trading, natural gas, and power generation business
- POSCO E&C: Plant, infrastructure, and construction
- POSCO DX: IT, EIC, Process automation

1) Include Steel, Rechargeable Battery Materials, infrastructure, and other sectors
2) Based on the sum of all transactions, including inter-company transactions, but excluding 'others' (23 companies including POSCO HOLDINGS)

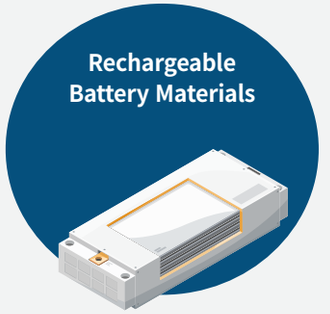
Business Portfolio Strategy

POSCO group is pursuing a portfolio strategy that takes Steel and Rechargeable Battery Materials as the group's core pillars, while cultivating Energy and New Businesses as the next-generation earnings base. Through this strategy, the group will lead future materials innovation and catapult itself into a world-class global company with sustainable competitiveness.

Key Pillars of Growth at POSCO group

As a key profit generator anchored in world-class native competencies, Steel will continue to drive the group's growth.

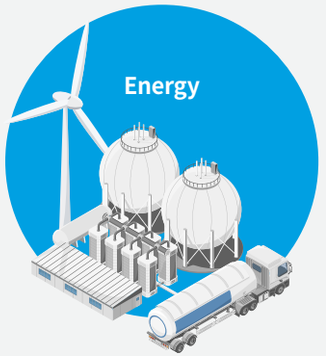
The group will reinforce market leadership by driving technology-based structural cost innovation, developing high-value-added strategic products, and transitioning to a low-carbon production system. To stay ahead of the global supply chain reset, the group will also deliver tangible outcomes from end-to-end localization investments spanning materials to products in high-profit, high-growth overseas markets.



Together with Steel, Rechargeable Battery Materials will be cultivated as a core business that powers the group's growth, with competitiveness secured at pace.

In raw materials, the group will fortify its global supply chain by securing high-quality resources, including lithium, at the right time to stay ahead of future demand growth. In materials, the group will innovate manufacturing and cost competitiveness while diversifying its profit base by uncovering new demand aligned to customer needs.

Next-generation Revenue Source



The Energy business will beef up profit-generating capabilities across each stage of the value chain.

The group will fortify profit structures across each business area by taking advantage of the Alaska LNG Project in the U.S. as an opening to expand Arctic-region gas assets, stabilizing the Singapore LNG trading corporation, expanding bunkering businesses linked to the Gwangyang LNG Terminal, and pressing ahead with renewable energy initiatives, including domestic offshore wind and overseas solar power+BESS.

New Businesses will identify and nurture future materials domains closely aligned to the group's strategy and marked by strong growth potential.

In our target domains, POSCO group will accelerate the development of specific business models —identified to match the societal goals of future megatrends—and ensure the rapid realization of visible results.

Generate stable profits and support the group's strategy

Infrastructure (DX, E&C, Logistics)

Business Strategy: Steel

POSCO group aims to solidify the global leader position by reinforcing our core competencies and investing in end-to-end localization.
To pave the way to sustainable growth, we will embark on the upstream-focused overseas growth market investment roadmap, advance our product-, region-, and sector-based portfolio, and transition to carbon reduction production systems and the electric arc furnace.

Key Strategy

Invest in overseas upstream processes

- Identify to invest in high-growth, high-profit regions and expand business
- Drive comprehensive partnerships with overseas partners in Steel and other core group businesses

Solidify market leadership

- Strengthen the steel ecosystem to defend against imports and drive cost innovation
- Based on long-term supply agreements with automotive and renewable energy customers, advance our sales portfolio to reflect region/sector-specific growth potential and profitability

Establish a technology-driven decarbonization framework

- Install electric arc furnaces and acquire carbon-reduction technology for premium steel products
- Build out a sourcing system to acquire carbon-reduced raw materials, e.g., scrap, HBI[1)]
- Launch a HyREX demonstration facility (300,000 tons), targeting 2030 commercial operation

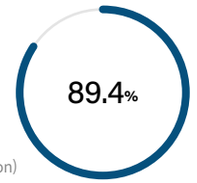
1) HBI(Hot Briquetted Iron)

Production Overview(2025)

Crude steel production in Korea

34,537Kt

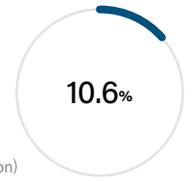
(89.4% of consolidated crude steel production)



Crude steel production overseas

4,106Kt

(10.6% of consolidated crude steel production)



2025 Business Highlight

Fundamental Innovation in Cost Structure

Beyond mere cost cutting, POSCO group achieved **KRW 600 billion in fixed-cost reductions** through technology-based innovation, rebuilding the kind of manufacturing competitiveness that can bring profitability back even in a low-growth economy.

Partnership with India's No. 1 Player

In India, POSCO group signed **a joint venture agreement (JVA) with JSW Steel to build an integrated steel mill with annual production capacity of 6 million tons**, securing overwhelming competitiveness backed by local infrastructure and accelerated permitting.

Integrated Localization in the North American Market

Through **a joint 2.7-million-ton-per-year EAF project in Louisiana** with Hyundai Motor Group, POSCO group is addressing automakers' needs for carbon-reduced steel. At the same time, the group is reviewing a cooperation framework with U.S.-based Cleveland-Cliffs to open a fast track into high-profit markets.

Accelerating Leadership in Low-carbon Products

With the **design of the Pohang HyREX demonstration facility (300,000 tons) completed** and the construction of the Gwangyang EAF staying on track, POSCO group is building a virtuous cycle that can respond in a timely manner to global automakers' demand for low-carbon products.

POSCO HOLDINGS-JSW Joint Venture Agreement (April 2026)

Introduction Video on POSCO's Hydrogen Reduction Ironmaking Technology(HyREX)

Business Strategy: Rechargeable Battery Materials

POSCO group will acquire prominent resource assets and seek technology innovations in products and processes to hone our market competence.
In particular, the group will take advantage of the current market downturn to secure undervalued, high-quality resources at the right time and upgrade manufacturing competitiveness, thereby laying the groundwork to preempt future growth opportunities.

Key Strategy

Proactively Secure High-quality Resources

- Expand investment with a focus on prominent resources - lithium brine in lithium mines in Australia and North/Latin America

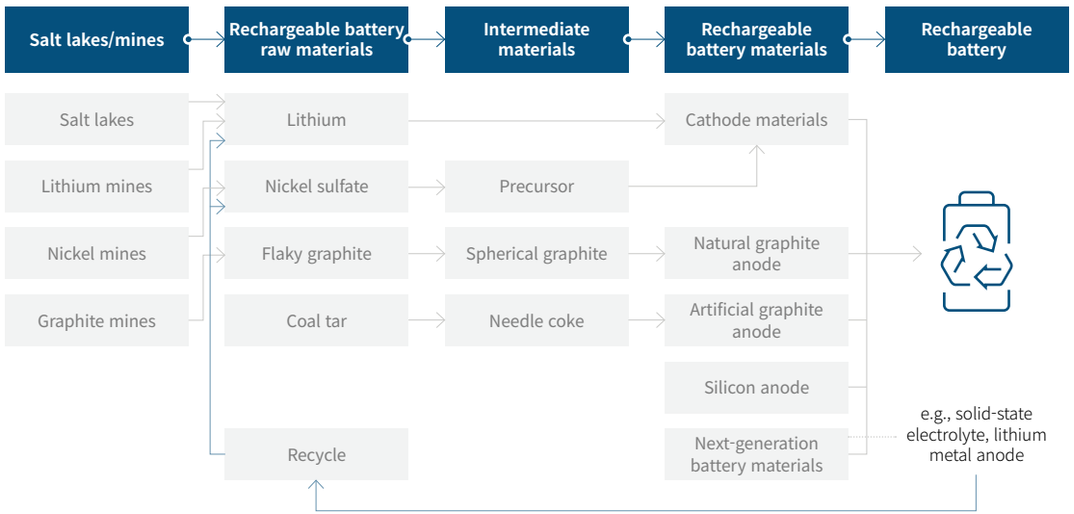
Strengthen the competitiveness of existing businesses

- Scale-up production volume at plant subsidiaries and drive cost and quality innovations

Get ahead to acquire next-generation core battery technologies

- Seize the next-generation battery materials market by ramping up solid electrolytes and Lithium metal anode to commercial-grade production

Rechargeable Battery Materials Portfolio



2025 Business Highlight

Securing High-quality Resources from Australian Lithium Mines

POSCO group **finalized the acquisition of a 30% stake in a major global lithium mine** owned by Australia's Mineral Resources. Through this resource investment, the group further reinforced the lithium business value chain by securing stable dividend income and long-term supply rights for lithium concentrate.

Additional Acquisition of Salt Lakes in Argentina

By securing additional mining rights from Lithium South near POSCO Argentina's salt lake operations, POSCO group has **laid down a production base in South America capable of producing more than 100,000 tons of lithium annually** and has maximized integrated synergies with its existing businesses.

Demonstration Project for Direct Lithium Extraction Technology in the US

POSCO group **signed an MOU with Anson Resources, a company holding brine resources in Utah, U.S., to build a direct lithium extraction (DLE) demo plant**. Based on this partnership, the group plans to demonstrate technology that can economically produce lithium even from low-concentration brine resources in Utah.

Completion of Cathode Material Vertical Integration and Securing Key Global Customers for Anode Materials

With the completion of the Gwangyang Precursor plant, POSCO group built a cathode material value chain that extends from raw materials to materials. In anode materials, the group proved its business competitiveness by **signing a four-year supply agreement worth KRW 671 billion** with a leading global automotive company.

Investment Agreement between POSCO HOLDINGS and Mineral Resources (April 2026)

View of the Hombre Muerto Salt Lake operated by POSCO ARGENTINA

Business Strategy: Infrastructure and New Businesses

POSCO group will build a solid and sustainable foundation for future growth by refining our Group businesses and expanding the footprint of our future materials projects. The group will strengthen LNG business across the value chain, enhance EPC capabilities, and drive the digital transformation across all sectors. New projects will be introduced into our future materials business domain.

Key Strategy

Energy

Strengthen LNG business across the value chain and expand projects associated with infrastructure

- E&P: Launch Phase 4 development in Myanmar; increase production volume at Senex Energy
- Terminal: Build infrastructure, i.e., Terminal No.2, and expand associated projects
- Power: Enter into the district energy business and expand power generation projects in ASEAN

E&C

Structure the business portfolio toward high value add projects

- Construction: Acquire more urban renewal projects in landmark zones
- Plant: Reinforce EPC capabilities for Steel/ Rechargeable Battery Materials businesses and high-value-added businesses, including offshore wind power

DX

Seek group-wide productivity innovation by rolling out the Intelligent Factory

- IT: Implement Intelligent & Autonomous Manufacturing plant to oversee the full process from order to shipping
- EIC: Aim for unmanned/automated manufacturing

New Business

Actively seek M&As in future materials and other promising projects

- Identify and engage in domains aligned to Group strategy, values, inherent capabilities, and with business growth potential

2025 Business Highlight

Strengthening LNG Value Chain Synergies

POSCO group is stitching together a more resilient LNG value chain. Shwe Project in Myanmar and Senex Energy in Australia are being ramped up to widen the Group's gas asset base, while the **HoA signed for the Alaska LNG project** opens the door to a multi-region procurement network. With the Singapore trading corporation now in place, the final link in the LNG value chain is now complete.

View of POSCO INTERNATIONAL's Senex Energy Facilities in Australia

Expansion of Global Palm Oil Assets

POSCO group has added scale and depth to its global palm business. The acquisition of a stake in Indonesia's PT.PAR gives the group access to 150,000 hectares of plantations, more than twice the size of Seoul. With PT.ARC, its palm oil refining arm, now completed, the group has **pushed the value chain** further downstream into biodiesel.

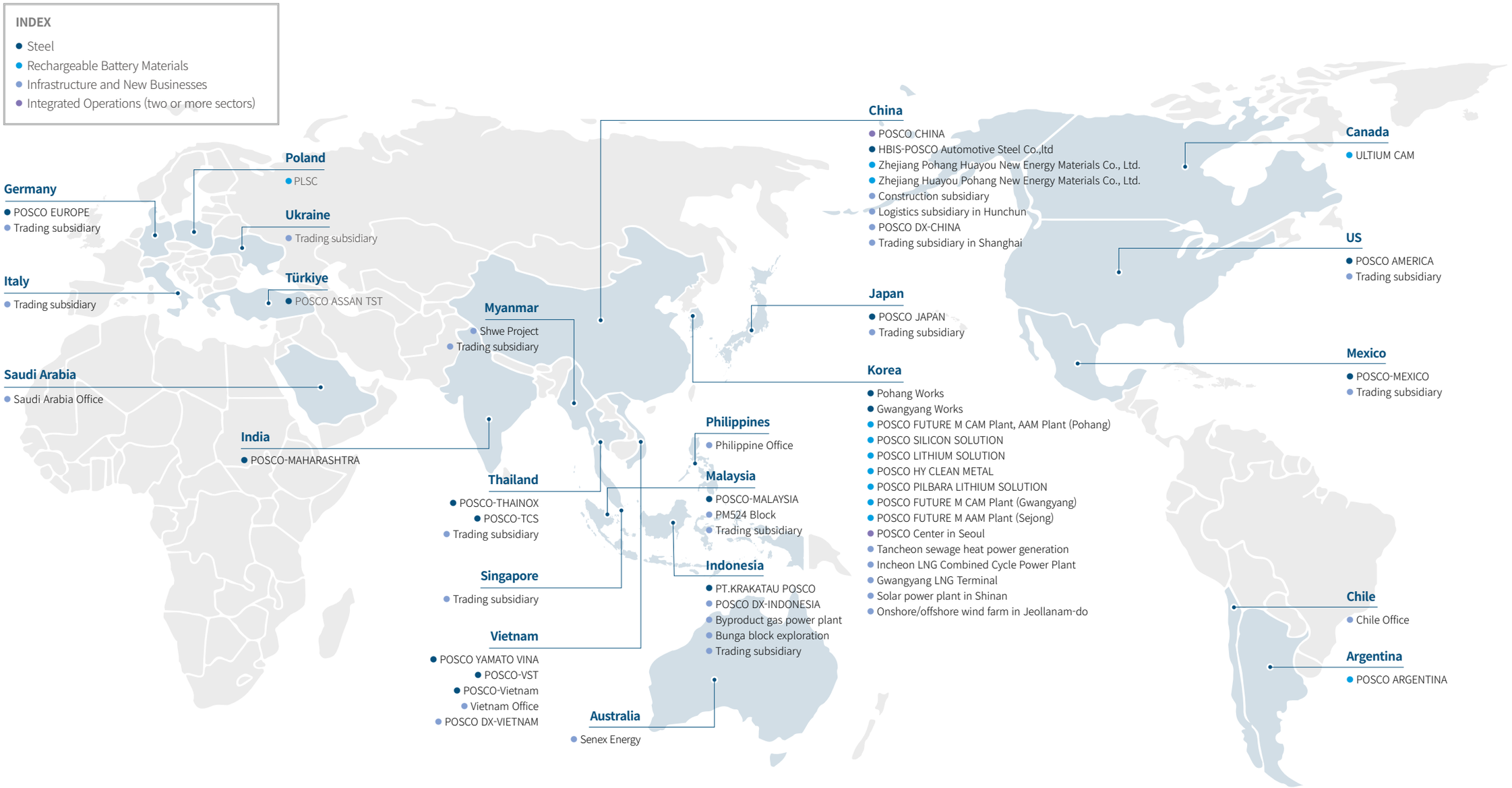
Introductory Video on POSCO INTERNATIONAL's Global Palm Business

Strategic Asset Sales and Cash Flow Optimization

POSCO group sharpened its portfolio by divesting non-core assets with limited strategic fit, **generating an additional KRW 1.1 trillion in cash**. The proceeds will serve as the funding base for nurturing New Engine business as future growth drivers.

Global Business Network

POSCO group continues to widen its R&D, production, and sales footprint across Korea and key overseas markets, including the U.S., Europe, and China. Anchored in a corporate network that now spans more than 20 countries, the group is taking global management to the next level—moving beyond the profitability of individual projects to maximize value across the entire group.



Management Guidelines

In 2026, persistent geopolitical risks and rising protectionism are expected to suppress growth momentum, keeping the global economy in a subdued growth phase. With its high dependence on external demand, the Korean economy is likely to record growth in the 1% range, as weak exports brought on by shrinking trade combine with delayed domestic demand recovery. In parallel, rapid progress in AI technology is accelerating structural shifts across industries, pitting companies against unprecedented transformations in the business landscape.

Despite challenges, POSCO group remains committed to exploring promising markets and adopting future technologies to turn crises into opportunities.

01 Steel

In the Steel business, we will recalibrate our native competencies to deliver the global standard. Additionally, decarbonization facility conversion and end-to-end offshore localization strategy will stay on track to undeterred implementation.

Despite markets flooded with underpriced imports and the fierce rivalry in high-value-added product technologies, the distance is widening between POSCO group and the competition. Instead of battling to survive, we choose to focus on the essence of our trade. For instance, our Cost Innovation 2030 (CI2030) initiative harnesses technology to innovate ways to address structural cost. Furthermore, the corporate portfolio identifies eight(8) essential products that align to our strategic business sectors, e.g., energy, mobility, to reinforce our market leadership and optimize profit models.

Simultaneously, construction of the Pohang HyREX demonstration facility and operation of the Gwangyang EAF are on schedule. Each project lays down the groundwork required to respond in time to future demand in the low-carbon steel market.

Meanwhile, domestic demand industries are experiencing drawn-out recession while protectionist trade policies intensify around the world. However, some markets, such as India and the U.S., promise positive outlook. It is in these municipalities that we plan to engage in JVs with prominent local players to build production bases, as a means to deliver on our end-to-end localization investment strategy. The strategy envisions a virtuous cycle, in which the profits generated in overseas growth markets will feed into decarbonization projects. This is how POSCO group intends to transition the risk posed by protectionism and the carbon net-zero mandate into opportunity for continuous growth and expansion.

02 Rechargeable Battery Materials

With the goal to enhance our global supply chain competitiveness in the Rechargeable Battery Materials business, we will make preemptive investments in prominent resources while innovating our products and processes. This will help us identify new demand and build a steady base of order flow.

In the lithium ore business, in addition to the upstream cooperation struck with Mineral Resources in Australia, POSCO group will define smelting business models, e.g., JV, and seek additional partnership projects to discover new sources of demand.

For brine lithium, by taking advantage of the operational experience gained from the Argentina Phase 1 plant, we will optimize processes and facility layout to stay on track toward commissioning Phase 2 this year. Looking ahead, by harnessing the Lithium South mining rights acquired through last year's acquisition agreement, POSCO group will build economies of scale with annual production capacity of up to 100,000 tons, including lithium carbonate. The Company intends to shore up economic feasibility by applying existing production infrastructure and operating systems.

As a business group, we will continue to push commercial scale DLE research to develop the technology that will enable the addition of low-concentration salt lakes, such as those in the U.S. and Chile, into our brine assets portfolio. By making choice selection of potential investment assets and engaging in joint exploration of smaller assets with capable resource developers, our goal is to establish a stable value chain.

The mission of the Materials business is to define a sustainable profit structure that can prevail in cutthroat competition. To do so, we will optimize processes to derive dramatic improvement in productivity, thereby closing the cost gap with our competition. Additionally, our R&D capability will be put to the test of what the market demands. We will develop essential technologies required for entry-level EVs and the energy storage system (ESS) as well as next-generation high-value-added products, which will help to diversify our business portfolio.

Anchored on our cost competence, technology prowess, and reliable supply chain, POSCO group will seek to identify new demand industries and expand the market base. Because global trade has contracted, it has become especially imperative to spare no effort to generate orders this year. To this end, POSCO group will reinforce our marketing capability by adding dedicated staff and organizations to address our customers' growth roadmap.

Management Guidelines

03 Energy

The energy business will focus on profit generation by each value chain, positioning itself as the group's Next Core engine that will succeed the glory of the Steel and Energy Materials business.

Energy demand is soaring due to AI and electrification. To defend their industrial security, economies are now racing to secure power supply, while leading businesses are retooling themselves to seize the upper hand in the race.

Amid the global competition for energy dominance, LNG is gaining renewed attention as an available energy source with relatively low carbon emission.

Therefore, it is our goal to take advantage of the Alaska LNG project as a foothold for securing Arctic-region gas assets. At the same time, we will bring the Singapore trading corporation, incorporated last year, up to speed and link its operations to the Gwangyang LNG Terminal, thereby expanding bunkering and commissioning businesses. Finally, by taking part in district power generation and integrated energy supply businesses and investing in overseas LNG power plants centered in the ASEAN region, we will build a more robust profit structure.

Meanwhile, we will lay down the groundwork to proactively address the Next LNG era by transitioning to new and renewable energy through partnerships. By working with global leaders, we will lower the risks of entering new markets, then bring capabilities in-house in phases and prepare for independent commercialization. Finally, POSCO group will participate in solar power + BESS businesses in the U.S., Australia and Europe, and join carbon capture and storage (CCS) demonstration projects in the U.S., where supportive policies are in place.

04 New Growth Drivers

POSCO group will discover and foster new growth drivers that promise a sustainable tomorrow for the group and steady profit generation.

By taking new business opportunities positioned to lead future industries to commercial scale, we will develop them into new growth drivers in synergy with existing businesses.

Additionally, we will continue to secure future growth opportunities through preemptive investments in next-generation technology companies. Through these initiatives, POSCO group will build a robust business portfolio capable of delivering stable growth even as uncertainty grows across the business landscape.

05 Workplace Safety Management

On the construction site and the shop floor, we aim to model K-SAFETY, a practice in which each worker assumes ownership of one's safety and the safety of everyone at the work site.

Anchored on the principle that no job can be performed without the guarantee of a safe workplace, we have performed a thorough analysis to work site risk factors and removed all hazards. This is how we intend to achieve what we believe to be a realistic goal to keep accident frequency at zero.

The true value of safety management exists not in slogans but in action. That is why the top management is encouraged to put their own boots on the ground to personally inspect risk factors, and take action to prevent accidents. To encourage every employee to get involved, we intend to cultivate a culture in which everyone becomes a safety agent charged with the duty to attend to one's own safety and those who work with him/her.

Furthermore, by leveraging the expertise of the safety company incorporated last year, POSCO group will introduce safety management system innovations to nip the bud of safety incidents. This company will be responsible for sharing its knowledge and knowhow across our global offices and domestic industries, adding integrity to our pledge to model exemplary workplace safety, a.k.a. K-SAFETY.

06 Materials Manufacturing Sector

POSCO group prides in its unparalleled technology in materials manufacturing. Based on its unrivaled technological capabilities in materials manufacturing, the Company aims to move beyond being a fast follower to become a game changer that will shape the future landscape of this industry.

The industrial landscape is changing at unprecedented speed, and uncertainty over its future direction has never been greater. Yet POSCO group will sharpen its core competitiveness and continue to find answers for future growth. This year, while shoring up our fundamentals to secure profitability in a slower-growth economy, we will seek out new business opportunities and deliver visible outcomes.

Risk Management

Risk Management Governance

POSCO Holdings operates a risk management system that maintains a constant watch over diverse risks arising across the group's business activities. For material matters, monitoring outcomes and response measures are reported to the Board. Oversight responsibilities for each type of risk are assigned to Board committees in line with their expertise and scope of responsibility. The Finance Committee takes charge of internal risks and external risks with significant financial impact, while also assuming Board-level oversight responsibility for industry-specific risks. Relevant working-level organizations, including the Corporate Strategy Division, Business Synergy Division, and Finance & IR Division, support the reporting framework. The ESG Committee oversees ESG risks across the full spectrum, with the Corporate Strategy Division providing working-level support. Among other non-business risks, the Audit Committee oversees ethics, compliance, and internal control, with support from the Corporate Compliance Division and the Corporate Audit Office.

* POSCO Research Institute participated in the review of external business risks

Risk Management Enhancement of Holding Company System

Beginning in 2025, the fourth year since POSCO group launched its holding company structure, the Group recalibrated the direction of its company-wide organizational operations to enhance synergy between the holding company and operating companies and sharpen risk management amid business uncertainty. Accordingly, business risks related to management strategy, new business development, global M&A, and ESG are now integrated into and managed by a single organization: the Corporate Strategy Division. In addition, to bolster risk management for overseas subsidiaries, regional representative corporations* were reorganized under POSCO Holdings. The Australia Critical Minerals R&D Lab was also established to secure critical minerals and reinforce the raw materials supply chain.

* POSCO-AMERICA, POSCO-EUROPE, POSCO-CHINA, POSCO-JAPAN

Business Risk Management

Business risks are monitored by the Corporate Strategy Division, Business Synergy Division, and Finance & IR Division, and reported to the Board. The Corporate Strategy Office under the Corporate Strategy Division oversees risk management in group-wide strategy execution and investment processes, while the Finance & IR Division operates the internal Investment Deliberation Committee and monitors financial risks such as foreign exchange and funding risks. Major issues identified by each department, together with key decision-making matters on new business investments, are first reported to the Finance Committee before final decisions are made by the Board. External business risks, including industry and financial market trends, changes in business conditions in regions where the Group is expanding globally, and competitors' strategies, are monitored on an ongoing basis by the POSCO Research Institute. The results are regularly reported to relevant departments and shared with all Group companies through the Global Information Hub (GIH), the Group's information hub.

ESG Risk Management

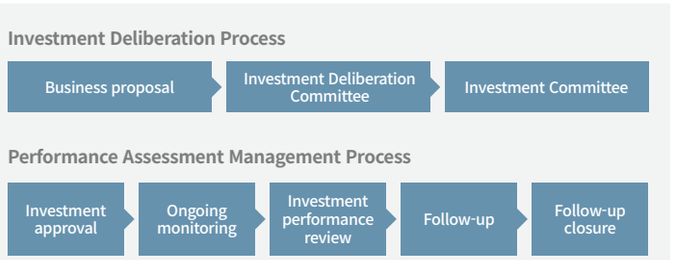
The ESG Office under the Corporate Strategy Division operates a group-wide system for managing and responding to ESG topics, helping POSCO group address internal and external ESG risks. The office sets criteria for identifying ESG risks requiring Group-level management and consolidates each operating company's ESG risk status monthly. Key ESG topics are reported semiannually to the Group ESG Council, POSCO group's C-level consultative body, where improvement measures are discussed. The ESG Committee receives reports on major ESG issues and Net Zero strategies, reviews response measures, and monitors progress.

Non-Business Risk Management

The Corporate Compliance Division oversees potential risks spanning internal audits to overseas compliance management. To reinforce financial risk management, the Corporate Audit Office under the Corporate Compliance Division reviews the status of consolidated financial statements and the operation of internal control over financial reporting (ICFR) on a quarterly basis, and reports the results directly to the Audit Committee. The Audit Committee receives quarterly reports from the external auditor on audit and review results for the consolidated financial statements. It also oversees the Company's financial risks by hearing the auditor's independent views through separate meetings held without management present.

Investment Deliberation

To keep investment risks in check, POSCO Holdings requires every investment proposal to go through the investment deliberation process. Investment projects are reviewed by the Investment Deliberation Committee, which is composed of members from specialized departments, and finalized only after deliberation and approval by the Investment Committee—a decision-making body chaired by the Representative Director & CEO—and the Board. Even after approval, overall matters, including ESG risks, remain subject to ongoing monitoring. Once an investment is completed, its performance is evaluated in accordance with the performance evaluation plan for each business. In particular, to minimize ESG risk factors and maximize growth opportunities, the Group requires anticipated ESG risk items to be included in investment proposals and reflected in post-investment performance evaluation criteria. In 2024, the Group amended relevant internal regulations and codified the Investment Risk Inspection Checklist to make investment risk reviews more stringent. The checklist consists of 10 key categories, including ESG, regional factors, industry and market conditions, economic feasibility, and legal matters.



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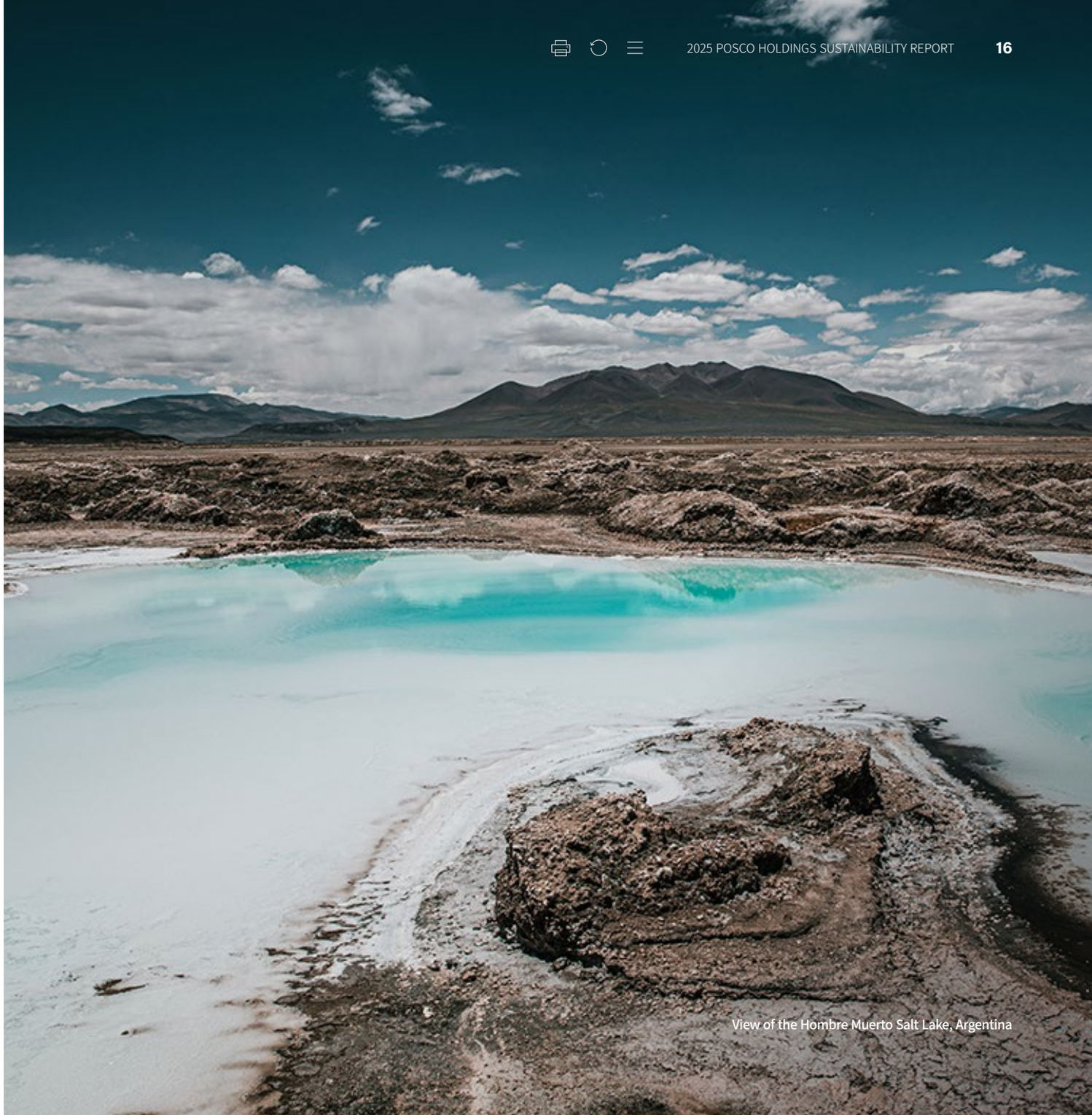


View of the Hombre Muerto Salt Lake, Argentina

Board of Directors

Board Composition

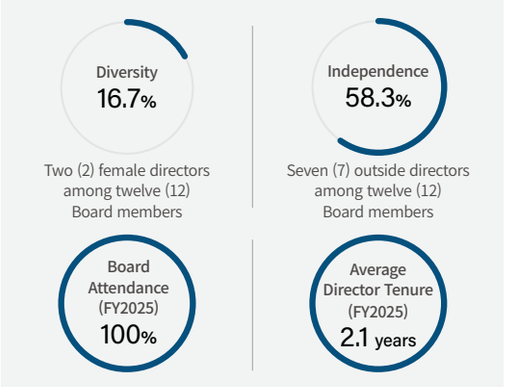
Pursuant to Article 542-8 of the Commercial Act, listed companies with assets totaling KRW 2 trillion or more must appoint at least three (3) outside directors* and ensure that outside directors make up a majority of the Board. Article 27 of POSCO Holdings' Articles of Incorporation (AOI) provides that the Board consists of no fewer than three (3) and no more than thirteen (13) members, including no more than eight (8) outside directors and no more than five (5) inside directors. As of March 2026, the Board consists of twelve (12) members: seven (7) outside directors, four (4) inside directors, and one (1) non-executive director. To reinforce Board independence, the Board has separated the role of Board Chair from the position of Representative Director & CEO, and since 2006, the Chair has been appointed from among the outside directors. At the Board meeting held in March 2026, outside director YOO, Jin Nyoung was appointed as Chair of the Board.

*Effective July 23, 2026, the title "Outside Director" will be changed to "Independent Director." The same applies hereinafter.

Regulations to Govern the Board

Corporate Governance Charter | Articles of Incorporation
Independence and Diversity Guidelines for Outside Director
Code of Ethics for Outside Directors

Board Composition and Performance



* As of Mar. 2026

LEE, Hee Geun (Non-executive director)	CHUNG, Seok Mo (Inside director)	KIM, Ki Soo (Inside director)	KIM, Joongi (Outside director)	YOO, Young Sook (Outside director)	YOO, Jin Nyoung (Outside director)	CHANG, In Hwa (Inside director)	KWON, Tae-Kyun (Outside director)	KIM, Jooyoun (Outside director)	SOHN, Sung Kyu (Outside director)	PARK, Sung Wook (Outside director)	LEE, Ju Tae (Inside director)
	E		A D E N	C D E	C D N		D E F	C D F	A D N	A C D F	F

A Chair, Audit Committee C Chair, Evaluation and Compensation Committee D Chair, CEO Candidate Pool Management Committee E Chair, ESG Committee
F Chair, Finance Committee N Chair, Director Candidate Recommendation Committee

A Member, Audit Committee C Member, Evaluation and Compensation Committee D Member, CEO Candidate Pool Management Committee E Member, ESG Committee
F Member, Finance Committee N Member, Director Candidate Recommendation Committee

* As of Mar. 2026

Members of the Board

Position	Outside Directors							Inside Directors				Non-Executive Director
Name	YOO, Jin Nyoung	YOO, Young Sook	KWON, Tae-Kyun	SOHN, Sung Kyu	KIM, Joongi	PARK, Sung Wook	KIM, Jooyoun	CHANG, In Hwa	LEE, Ju Tae	KIM, Ki Soo	CHUNG, Seok Mo	LEE, Hee Geun
Expertise	New technology development	Environment, climate	Finance, international finance, investment	Finance, accounting	International trade, corporate governance	Business management, technology development	Marketing	Steel production/ technology, new business, investment, marketing	Strategy, investment, group-level business management	Steel technology, new technology development	Steel, new business	Steel production/ technology
Committees	· Chair, Board · Chair, CEO Candidate Pool Management Committee · Member, Director Candidate Recommendation Committee · Member, Evaluation and Compensation Committee	· Chair, Evaluation and Compensation Committee · Member, ESG Committee · Member, CEO Candidate Pool Management Committee	· Chair, Finance Committee · Member, ESG Committee · Member, CEO Candidate Pool Management Committee	· Chair, Director Candidate Recommendation Committee · Member, Audit Committee · Member, CEO Candidate Pool Management Committee	· Chair, ESG Committee · Member, Director Candidate Recommendation Committee · Member, Audit Committee · Member, CEO Candidate Pool Management Committee	· Chair, Audit Committee · Member, Evaluation and Compensation Committee · Member, Finance Committee · Member, CEO Candidate Pool Management Committee	· Member, Evaluation and Compensation Committee · Member, Finance Committee · Member, CEO Candidate Pool Management Committee	-	· Member, Finance Committee	-	· Member, ESG Committee	-
Affiliation	· Representative director, ANGEL 6+	· Honorary Chairperson (non-executive), Climate Change Center · Outside Director, Macrogen	· Outside Director, Kumho Petrochemical	· Professor Emeritus of Business Administration, Yonsei University	· Professor of Law, Yonsei University Law School · Member, International Court of Arbitration, International Chamber of Commerce	· Outside Director, SK Hynix NAND Product Solutions Corp. (unlisted)	· Outside Director, SK Innovation	· Representative Director & CEO	· Representative Director and President, POSCO Holdings; Head, Corporate Strategy Division, POSCO Holdings	· CTO, New Experience of Technology Hub (N.E.X.T. Hub), POSCO Holdings	· Head, Business Synergy Division, POSCO Holdings	· Representative Director and President, POSCO
Career	· CTO/President, LG Chem · Head/President, LG Chem R&D Center · Member, National Science & Technology Council	· Chair, Climate Change Center · Co-CEO, Climate Change Center · Minister of Environment, Republic of Korea · Vice President, Korea Institute of Science and Technology	· Ambassador of the Republic of Korea to the United Arab Emirates · Administrator, Public Procurement Service, Republic of Korea · Director General, Korean Free Economic Zones Planning Group, Ministry of Finance and Economy, Republic of Korea · Director General for International Trade and Investment, Ministry of Knowledge Economy, Republic of Korea	· Outside Director, Samsung Asset Management · President, Korean Accounting Association · Distinguished professor of the Korean Accounting Association at Samil PwC · Non-Standing member, Securities and Futures Commission, Republic of Korea	· Professor, Yonsei University Graduate School of International Studies · Founding President, Hills Governance Center, Yonsei University/World Bank/CSIS · Attorney, Foley & Lardner LLP	· Chair, National Academy of Engineering of Korea · Management Advisor (Vice Chairperson), SK Hynix · Chairman, Korea Semiconductor Industry Association · CEO (President-Vice Chairman), SK Hynix	· Vice President, P&G Japan/Korea, Global Chief Marketing Officer, P&G Grooming	· Representative Director and President (Head of Steel Business Unit), POSCO · Inside Director and Vice President (Head of Steel Production Division), POSCO · Head (Sr. EVP), Technology and Investment Division, POSCO; Head, Technical Research Laboratories, POSCO	· Head (Sr. EVP), Corporate Strategy Team, POSCO Holdings · Inside Director and Head (Sr. EVP), Corporate Strategy Division, POSCO · Head (Sr. EVP), Procurement and Investment Division, POSCO	· Head (Sr. EVP), Technical Research Laboratories, POSCO · Head (EVP), Low-Carbon Process R&D Center, POSCO · Head (SVP), Engineering Solution Dept., POSCO	· Head (EVP), Industrial Gas Business Division, POSCO · Representative Director and President, POSCO Zhongtai Air Solution · Head (SVP), Rechargeable Battery Materials Business Dept., POSCO	· Head (Sr. EVP), Facility Reinforcement Task Force, POSCO · Inside Director and Head (Sr. EVP), Safety and Environment Division, POSCO · Representative Director and President, POSCO M-TECH
Education	· Ph.D., Polymer Engineering, Lehigh University, US	· Ph.D., Biochemistry, Oregon State University, US	· Ph.D., International Studies, Chung-Ang University	· Ph.D., Business Administration, Northwestern University, US	· J.D., Law, Georgetown University, US	· Ph.D., Material Engineering, KAIST	· M.S., Biology, Yonsei University	· Ph.D., Ocean Engineering, MIT, US	· B.A., Economics, Kyungpook National University	· Ph.D., Metallurgy, University of Sheffield, UK	· M.S., Steel Engineering, Pohang University of Science and Technology	· M.S., Metallurgical Engineering, Pohang University of Science and Technology
Age	68	70	70	66	60	68	58	70	62	60	59	63
Year of appointment	2022	2021	2021	2022	2023	2024	2026	2024	2025	2024	2026	2026
Board attendance rate in 2025	100%	100%	100%	100%	100%	100%	New appointment	100%	100%	100%	New appointment	New appointment

* As of Mar. 2026

Board Committees

In March 2024, POSCO Holdings amended its Articles of Incorporation (AOI) and regulations associated with Board operations. Currently, there are six (6) Board committees: ESG Committee, Director Candidate Recommendation Committee, Evaluation and Compensation Committee, Finance Committee, Audit Committee, and CEO Candidate Pool Management Committee. To ensure continuity of operations, changes in members who serve on committees are kept to a minimum. All committees invite participation of outside directors. To ensure enhanced independence, certain committees are exclusively composed of outside directors; they include the Audit Committee, Director Candidate Recommendation Committee, Evaluation and Compensation Committee, and CEO Candidate Pool Management Committee.

Committee Composition

Committee and Roles		Member		% of Outside Directors
ESG Committee 	· Monitor ESG practices and publish reports · Oversee matters related to the operation of the Board and its committees · Review internal transactions under the Monopoly Regulation and Fair Trade Act · Report material ESG updates of affiliates	Chair Members	KIM, Joongi YOO, Young Sook KWON, Tae-Kyun CHUNG, Seok Mo	75%
Director Candidate Recommendation Committee 	· Assess the qualifications of outside director candidates and recommend them to the AGM	Chair Members	SOHN, Sung Kyu YOO, Jin Nyoung KIM, Joongi	100%
Evaluation and Compensation Committee 	· Oversee matters related to executive evaluation and formulation of compensation plans · Deliberate on matters related to director compensation and retirement benefits	Chair Members	YOO, Young Sook YOO, Jin Nyoung PARK, Sung Wook KIM, Jooyoun	100%

Committee and Roles		Member		% of Outside Directors
Finance Committee 	· Prior review and approval of investment plans for new and existing businesses · Prior review and approval of corporate bond issuance and key financing decisions	Chair Members	KWON, Tae-Kyun PARK, Sung Wook KIM, Jooyoun LEE, Ju Tae	75%
Audit Committee 	· Audit the legality of management's business decisions and activities · Assess the soundness and appropriateness of financial activities and the integrity of financial reporting · Evaluate the operation of ICFR	Chair Members	PARK, Sung Wook SOHN, Sung Kyu KIM, Joongi	100%
CEO Candidate Pool Management Committee 	· Deliberate on the basic qualifications of CEO candidates as defined by the Board · Review pooling results for CEO candidates · Review CEO candidate development plans	Chair Members	YOO, Jin Nyoung YOO, Young Sook KWON, Tae-Kyun SOHN, Sung Kyu KIM, Joongi PARK, Sung Wook KIM, Jooyoun	100%

* As of Mar. 2026

Board Expertise

POSCO Holdings systematically manages the core competencies required on the Board. To that end, the Company utilizes a Board Skills Matrix to ensure that the Board has the ability and expertise required to effectively oversee risks and opportunities across management activities. In particular, ESG and sustainability management capabilities are deemed as key competencies required on the Board to assess key business risks and opportunities. Moreover, regular programs are offered to enhance the expertise of Board members and its committees. In 2025, multiple topics were covered, such as global ESG trends, response strategies, changes in the external environment, and opportunity factors associated with key sectors of POSCO group.

Board Skills Matrix

Indicator	Category	Outside Directors							Inside Directors				Non-Executive Director
		YOO, Jin Nyoung	YOO, Young Sook	KWON, Tae-Kyun	SOHN, Sung Kyu	KIM, Joongi	PARK, Sung Wook	KIM, Jooyoun	CHANG, In Hwa	LEE, Ju Tae	KIM, Ki Soo	CHUNG, Seok Mo	LEE, Hee Geun
General	① ESG / Sustainability Management	●	●	●	●	●	●	●	●	●	●	●	●
	② Leadership	●	●	●	●	●	●	●	●	●	●	●	●
	③ Risk Management	●	●	●	●	●	●	●	●	●	●	●	●
Specific	① Industry Experience	●					●	●	●	●	●	●	●
	② Technology, Digital, and Innovation	●	●				●		●		●	●	●
	③ Finance and Accounting			●	●	●	●	●	●	●		●	●
	④ Law and Public Policy	●	●	●		●							
	⑤ International Management	●		●		●	●	●	●	●		●	●
	⑥ Business Development and M&A	●					●	●	●	●	●	●	●

Training for Outside Directors

Date	Provided by	Attendance	Key Topics
Feb. 3, 2025	Securities firm analysts	5	· Meeting hosted with invited experts in the steel/ rechargeable battery industries
Apr. 19, 2025	Relevant departments from POSCO International LNG Terminal	All	· Report on the LNG terminal business · Site visit of LNG Terminals 1 and 2 and LNG pier
Jun. 5, 2025	KIM, Hwa-Jin, Professor at Seoul National University School of Law	All	· Lecture and discussion on Korean corporate governance
Jul. 3, 2025	KIM, Jong-Dae, Professor at Inha University	All	· Lecture and discussion on changes in global ESG trends and corporate strategic response measures
Aug. 13, 2025	Kim & Chang	All	· Impacts of and response directions to amendments to the Commercial Act
Oct. 17, 2025	POSCO Future M	5	· Site visit of POSCO Future M Sejong Energy Materials Research Institute and Anode Materials Plant 2
Dec. 4, 2025	External expert and Strategic Energy Business Office	All	· Power supply plan for steelmaking processes including hydrogen-based reduction ironmaking

Board Diversity

To ensure balanced representation of interests on the Board, POSCO Holdings' Articles of Incorporation, Corporate Governance Charter and the Board Independence and Diversity Policy outline the required director qualifications. Our rigorous effort to enhance Board diversity begins early in the director candidate screening process. At the Annual General Meeting of Shareholders (AGM) held in March 2026, KIM Jooyoun was appointed, shoring up Board diversity in terms of gender and professional expertise. Kim was formerly Vice President of P&G Japan/Korea and brings extensive experience in marketing and business management.

POSCO Holdings Articles of Incorporation | POSCO Holdings Corporate Governance Charter | Board Independence and Diversity Policy

Outside Director Candidate Pool

Area of Expertise	As of Dec. 2019		As of Dec. 2025		Change (against 2019)	
	Total	Female	Total	Female	Total	Female
Total	142	18	417	112	275	94
Finance	9	1	24	4	15	3
Accounting	21	2	61	8	40	6
Industry	48	7	116	41	68	34
Academia	28	2	103	28	75	26
Law	18	2	80	24	62	22
Public Sector	18	4	33	7	15	3

Board Independence

POSCO Holdings stipulates in its Operating Rules For the Board of Directors that the Director Candidate Recommendation Committee be composed entirely of outside directors. The Committee reviews and recommends outside and inside director candidates, appoints members of Board committees, and conducts preliminary review on the appointment of the Representative Director, reinforcing the independence of the appointment process. To ensure fair and transparent appointments, POSCO Holdings has operated the Outside Director Candidate Recommendation Advisory Panel since 2004. Composed of five (5) senior experts from industry, finance, academia, and law, the panel proposes a candidate pool of five (5) times the number of directors to be appointed, free from the influence of any specific group. The Committee reviews candidate qualifications and recommends the final nominees to the AGM, and the outside director candidate pool is updated on a regular basis, at least once a year.

Inside Director Appointment Process

Outside Director Appointment Process

Resolution to operate the Outside Director Candidate Recommendation Advisory Panel
Director Candidate Recommendation Committee
Develop talent pool and recommend five (5) candidates per vacancy
Outside Director Candidate Recommendation Advisory Panel
Qualify and rank candidates
Director Candidate Recommendation Committee
Nominate candidates
Director Candidate Recommendation Committee
Appoint outside director(s)
AGM

Concurrent Positions held by Outside Directors

POSCO Holdings manages positions concurrently held by outside directors at other companies in accordance with the Commercial Act and other applicable laws and regulations. Outside directors are required to announce in advance with the Board and the Company any external commitments that may affect their participation on the Board. Pursuant to Article 542-8 of the Commercial Act and Article 34 of its Enforcement Decree, POSCO Holdings adheres to the provisions that disqualify outside directorship. Therefore, an outside director found to be in breach of these statutes is subject to dismissal. The concurrent positions held by outside directors currently serving on the Board are listed below. None is in violation of our stated policy.

Concurrent Positions Assumed by Outside Directors

Name	Initial Appointment Date	Organization	Responsibility	Tenure at the Organization	Listing of the Organization
YOO, Young Sook	Mar. 12, 2021	Macrogen	Outside director	2021–present	Listed
KWON, Tae-Kyun	Mar. 12, 2021	Kumho Petrochemical	Outside director	2022–present	Listed
YOO, Jin Nyoung	Mar. 18, 2022	ANGEL 6+	Representative director	2019–present	Unlisted
PARK, Sung Wook	Mar. 21, 2024	SK Hynix NAND Product Solutions	Outside director	2026–present	Unlisted
KIM, Jooyoun	Mar. 24, 2026	SK Innovation	Outside director	2023–present	Listed
SOHN, Sung Kyu	Mar. 18, 2022	-	-	-	-
KIM, Joongi	Mar. 17, 2023	-	-	-	-

* Note: Concurrent positions held at non-profit organizations and/or foundations are excluded.

Conflicts of Interest of Outside Directors

To ensure that outside directors are independent and impartial, and as a means to screen for any previous transactions and/or commercial agreements with the Company, POSCO Holdings performs cross-examination of each candidate's career history and business record. Once selected as a finalist, the candidate must submit a statement to confirm the absence of any commercial interest and/or engagement with the Company. Currently, none of our outside directors has previously worked at POSCO Holdings or its affiliates nor had any transaction with the Company during the past three (3) fiscal years (2023 -2025).

Shareholder Nomination Program

To strengthen shareholder communication and secure a diverse pool of outside director candidates, POSCO Holdings has operated the "shareholder nomination program" since 2018. Since the 2025 AGM, the Company has lowered the nomination eligibility threshold from 0.5% to shareholders holding 0.1% or more, offering responsible shareholders fairer opportunities and enhancing the program's effectiveness as well as governance transparency and openness. At least four months before the AGM, POSCO Holdings sends official letters under the name of the Chair of the Director Candidate Recommendation Committee to shareholders holding 0.1% or more and posts a website notice requesting each shareholder to recommend one (1) preliminary candidate. Nominations are accepted by email or post, and shareholder-nominated candidates undergo the same qualification review by the Outside Director Candidate Recommendation Advisory Panel as other candidates

Board Evaluation

POSCO Holdings has conducted Board evaluations in the first quarter of each year since introducing the system in 2010. All directors evaluate the Board and the committees on which they serve, and the results are used as reference materials for determining director compensation and appointing outside directors. The evaluation covers twenty-seven (27) items across four areas --roles, responsibilities, structure, and operation --plus six (6) to nine (9) additional items for each committee. Quantitative assessments are combined with descriptive comments to diagnose overall Board operation. Evaluation results and resulting improvement measures are reported to the Board and used for follow-up actions.

In 2024, POSCO Holdings decided to introduce individual assessments for outside directors and put the system into full operation in 2025. The individual assessment combines self-assessments and peer reviews, evaluating each outside director's diligence and contribution based on quantitative items --including Board participation, independence, diligence, expertise, and contribution --together with descriptive comments. Results are shared with the Director Candidate Recommendation Committee and used as reference materials when reviewing outside director reappointments. Relevant information is also included in the Corporate Governance Report.

Director Compensation

In compliance with Article 388 of the Commercial Act and Article 36 of the Articles of Incorporation (AOI) of POSCO Holdings, Director compensation is determined within the compensation limit approved by the AGM. To ensure independent and objective determination, the total value of director compensation is reviewed and confirmed by the Evaluation and Compensation Committee, exclusively composed of outside directors. In November 2023, the Evaluation and Compensation Committee established the operational guidelines for the Clawback Policy. The guidelines in practice help to strengthen the alignment between director accountability and compensation.

Representative Director and Inside Directors[1] Compensation

- Salary: One-twelfth (1/12) of the total annual base salary is paid each month in consideration of the position, delegated duties, roles and responsibilities of each director.
- Performance bonus: Bonus is paid by making sixty percent (60%) quantitative assessment against the fiscal year financial performance and 40% qualitative assessment against ESG progress and other key management activities.
- Performance bonus assessment breakdown (FY 2025)
  - Quantitative assessment (60%): Consolidated operating profit (15%); consolidated operating cash flow (5%); consolidated revenue (10%); consolidated ROA (5%); stock price (15%); R&D expenditure (5%); and revenue from new growth businesses (5%).
  - Qualitative assessment (40%): ESG (10%)[2]; business innovation and strategy (15%); investment and technology (10%); people and culture (5%); and other key management activities.

Outside Director Compensation

- Compensation for outside directors is assessed by aggregating work performed and comparable benchmarks to deliver a package deemed adequate and socially acceptable.

1) Standards used to determine individual compensation for the representative directors and registered executives as well as the payment details are disclosed in the annual report. Business Report for FY 2025

2) ESG (10%) includes, but is not limited to, total recordable injury frequency rate (safety) and global ESG issue management progress.

CEO Succession

The appointment of the Representative Director & CEO of POSCO Holdings complies with Article 29 "Appointment of the Representative Director & CEO" of the Articles of Incorporation. The CEO Candidate Recommendation Committee, exclusively composed of outside directors, assesses the qualifications of the candidates in the pool. Then, the Board recommends the finalist to the AGM. Once the finalist is approved, the candidate is appointed as an inside director at the AGM. Then, the Board appoints the inside director as the Representative Director, which concludes the appointment process. To ensure independence and transparency throughout the appointment process, the CEO Candidate Recommendation Committee is established by resolution and composed entirely of outside directors. The Committee is responsible for developing the CEO talent pool, defining specific assessment standards to qualify the candidates, and performing in-depth, multi-faceted evaluations.

In December 2023, the Board approved the "POSCO-Proper Enhanced Governance Standard" and launched the CEO Candidate Recommendation Advisory Panel program, composed of distinguished professionals from outside POSCO group. The Committee incorporates the Panel's perspective in the CEO candidate qualifying process, thereby reinforcing the independence and professionalism of the representative director appointment process. In March 2024, with the goal to systematically identify, groom and manage the CEO talent pool, POSCO Holdings launched the CEO Candidate Pool Management Committee as a standing organization composed entirely of outside directors. POSCO Holdings has a CEO talent development program, through which the Company is constantly engaged in identifying and managing the internal pool and external candidates recommended by search firms.

Basic Qualifications of CEO Candidates

In December 2023, the Board approved the "POSCO-Proper Enhanced Governance Standard," which defines specific CEO candidate qualifications. Furthermore, by disclosing the standards to the public, transparency has been enhanced in the CEO appointment process. The newly established CEO candidate evaluation and development guidelines define five (5) pillars and twelve (12) detailed criteria. Based on these guidelines, POSCO Holdings takes a systematic approach to evaluating and developing CEO candidates.

Qualifications of CEO Candidate Pool

Management Capability
· Vision and value proposal
· Strategic thinking and decision-making
· Innovation leadership and crisis response
Industry Expertise
· Insight on the Group's core businesses and identification of business opportunities
· Knowledge of upcoming technologies
Global Competence
· Perception of global environment and cultures
· Global business strategy development and operation
Leadership
· Talent development
· Communication skills
Integrity·Ethics
· Business ethics and compliance
· Alignment with social values

Board Activities in 2025 (up to Q1 2026)

Board of Directors

Date of Meeting	Attendance	Agenda	Result
Feb. 5, 2025	10/10	1. Business group's mid- to long-term management strategy and 2025 consolidated business plan	Approved
		2. The 57th Operations Report and Financial Statements and the schedule for the next Annual AGM	Approved
		3. 2025 financing plan	Approved
		4. Amendment to the Internal Control over Financial Reporting(ICFR) policy	Approved as amended
		5. Improvement of the Company's performance evaluation system and executive compensation system	Approved as amended
		Reported items ① 2024 consolidated business performance ② 2024 ICFR operational status ③ 2024 evaluation of the ICFR operational status	
Feb. 19, 2025	10/10	1. Recommendation of inside director candidates	Approved
		2. Partial amendments to the Articles of Incorporation	Approved as amended
		3. Agenda items for the 57th AGM	Approved
		4. Cancellation of treasury shares, and treasury shares report	Approved
		Reported items ① Reports from the 1st ESG Committee	
Mar. 20, 2025	10/10	1. Appointment of the Board of Directors chair	Approved
		2. Appointment of the Representative Director and conferral of title on inside directors	Approved
		3. Appointment of Board Committee Members	Approved
May 13, 2025	10/10	1. Dividends payment in Q1 of 2025	Approved
		2. Charitable donations made to Yeongnam region wildfire recovery (ratification)	Approved
		3. Extension of the payment guarantee for NMC borrowings	Approved
		4. Participation in the paid-in capital increase of POSCO FUTURE M	Approved
		5. Participation in the paid-in capital increase of POSCO Pilbara Lithium Solution	Approved
		6. Participation in the paid-in capital increase of POSCO GS Eco-Materials	Approved
		7. Amendment to the Operating Rules for the Board of Directors	Approved
		Reported items ① Q1 2025 consolidated business performance ② 2024 Board activities and evaluation results	
Jul. 3, 2025	10/10	1. Disposal of equity stakes in ZPSS and QPSS	Approved
Aug. 6, 2025	10/10	Reported items ① POSCO group safety management innovation plan	
Aug. 12, 2025	10/10	1. Dividend payment in Q2 of 2025	Approved
		2. Charitable donations to nationwide rain damage recovery effort (ratification)	Approved
		Reported items ① Implementation of Board-approved agenda items in 2025 ② Q2 2025 consolidated business performance ③ Update on the integrated steel mill project in India	
Nov. 11, 2025	10/10	1. Dividend payment in 2025	Approved
		2. Investment in Australian lithium mines	Approved
		3. Endowment to establish Occupational Incident Family Care Foundation	Approved
		Reported items ① Q3 2025 consolidated business performance	
Dec. 8, 2025	10/10	1. Business group's mid- to long-term business strategy and 2026 consolidated business plan	Approved
		2. 2026 bond issuance limit	Approved
		3. 2026 safety and health plan	Approved
		Reported items ① Outcome of inspection on adherence to the 2025 compliance control standards ② Implementation of Board-approved agenda items in 2025	
Feb. 3, 2026	10/10	1. The 58th Operations Report and Financial Statements and the schedule for the next AGM	Approved
		Reported items ① 2025 consolidated business performance ② 2025 ICFR operational status ③ 2025 evaluation of the ICFR operational status	
Feb. 19, 2026	10/10	1. Recommendation of inside director and other non-executive director candidates	Approved
		2. Partial amendments to the Articles of Incorporation	Approved
		3. Agenda items for the 58th AGM	Approved
		4. Cancellation of treasury shares, and treasury shares report	Approved
		5.Improvements to Board operations and amendment of relevant rules	Approved as amended
		Reported items ① Implementation of Board-approved agenda items in 2025	
Mar. 24, 2026	12/12	1. Appointment of the Board of Directors chair	Approved
		2. Appointment of representative director	Approved
		3. Appointment of Board Committee Members	Approved as amended

※ Approved: 32 items, Approved as amended: 5 items, Rejected: 0 items

Board Activities in 2025 (up to Q1 2026)

Board Committee

ESG Committee

Date of Meeting	Attendance	Agenda	Result
Feb. 13, 2025	4/4	1. Endowment to POSCO Educational Foundation	Deliberated
		Reported items ① Establishment of the Environmental Stewardship Advisory Committee ② Establishment of the internal ESG control system ③ Pledge to the Group Human Rights Management Declaration	
May 8, 2025	4/4	1. Participation in the paid-in capital increase of POSCO FUTURE M 2. Participation in the paid-in capital increase of POSCO Pilbara Lithium Solution 3. Amendment to the Operating Rules For the Board of Directors 4. Publication of the 2024 Sustainability Report (including double materiality assessment results)	Deliberated Deliberated Deliberated Approved
		Reported items ① Q1 2025 consolidated ESG performance	
Aug. 6, 2025	4/4	1. Selection of contractor and construction service agreement for POSCO Global Center Site 3 2. Administration of AC fund to explore new businesses	Rejected Approved
		Reported items ① Q2 2025 consolidated ESG performance ② Update on self-directed fair trade CP practices for 1H 2025	
Nov. 5, 2025	4/4	1. Participation in P-Argentina rights offering for acquisition of mining rights 2. Construction service agreement signing for POSCO Global Center Site 3 3. Endowment to establish Occupational Incident Family Care Foundation	Approved Approved Deliberated
		Reported items ① Q3 2025 consolidated ESG performance	
Dec. 4, 2025	4/4	1. 2026 POSCO and POSCO brand license agreement 2. 2026 POSCO Center lease agreement 3. Contribution to The Korea Society 4. Contribution for year-end donations made to community support activities	Approved Approved Approved Approved
		Reported items ① Update on self-directed fair trade CP practices for H2 2025	
Jan. 22, 2026	4/4	Reported items ① Review outcomes on the possibility of recognition and use of emission reduction at PT.BIA as carbon credits in Korea ② Measures to improve operating companies' ESG disclosure indices	

※ Approved: 8 items, Approved as amended: 0 items, Rejected: 1 item

ESG Committee

Date of Meeting	Attendance	Agenda	Result
Feb. 13, 2026	4/4	1. Improvements to Board operations and amendment of relevant rules	Deliberated
		Reported items ① 2026 POSCO consolidated ESG management action plan ② 2026 POSCO group human rights management action plan	

Director Candidate Recommendation Committee

Date of Meeting	Attendance	Agenda	Result
Jan. 3, 2025	3/3	1. Qualification review of outside director candidates	Approved
Feb. 19, 2025	3/3	1. Recommendation of outside director candidates 2. Qualification review of inside director candidates 3. Appointment of 2025 Board Committee Members	Approved Deliberated Deliberated
Mar. 20, 2025	3/3	1. Appointment of the Representative Director	Deliberated
Aug. 12, 2025	3/3	1. Operation of the Outside Director Candidate Recommendation Advisory Panel	Approved
Oct. 28, 2025 (adjourned) Nov. 5, 2025 (resumed)	3/3	1. Qualification review of outside director candidates	Approved
Feb. 19, 2026	3/3	1. Recommendation of outside director candidates 2. Recommendation of inside director and other non-executive director candidates 3. Appointment of 2026 Board Committee Members	Approved Deliberated Deliberated
Mar. 24, 2026	3/3	1. Appointment of the Representative Director	Deliberated

※ Approved: 5 items, Approved as amended: 0 items, Rejected: 0 items

Evaluation and Compensation Committee

Date of Meeting	Attendance	Agenda	Result
Jan. 22, 2025	4/4	1. Improvement of the Company's performance evaluation and executive compensation system	Deliberated
Feb. 5, 2025	4/4	1. 2024 group-wide business performance assessment	Approved
Feb. 19, 2025	4/4	1. 2025 business performance assessment and plans for mid- to long-term assessment (2025–2027)	Approved
Feb. 4, 2026	4/4	1. 2025 group-wide management performance assessment	Approved

※ Approved: 3 items, Approved as amended: 0 items, Rejected: 0 items

Board Activities in 2025 (up to Q1 2026)

Board Committee

Audit Committee

Date of Meeting	Attendance	Agenda	Result
Jan. 24, 2025	3/3	1. Agree to appoint the head of the Internal Audit Department 2. Authorization of audit and non-audit service agreements for POSCO Holdings and its consolidated entities 3. Amendment to the ICFR policy 4. 2024 evaluation of the ICFR operational status 5. 2024 Audit Committee activities	Approved Approved Approved Approved Approved
		Reported items ① 2024 ICFR operational status	
Feb. 26, 2025	3/3	1. 2024 year-end consolidation internal audit result 2. 2024 internal audit performance and 2025 plan 3. Deliberation on AGM agenda items	Approved Approved Approved
		Reported items ① 2024 year-end consolidation external audit result	
Mar. 20, 2025	3/3	1. Appointment of the chair of the Audit Committee	Approved
Apr. 24, 2025	3/3	1. Internal audit result of the Q1 2025 consolidated financial statements 2. Authorization of non-audit services for POSCO India PC	Approved Approved
		Reported items ① Updates on the 2024 20-F audit and the external review of Q1 2025 consolidated financial statements	
Aug. 13, 2025	3/3	1. Authorization of non-audit service agreements for POSCO E&C subsidiaries 2. Internal audit results for the Q2 2025 consolidated financial statements 3. Assessment results of external auditor activities for 2024 4. H1 2025 internal audit results and H2 2025 plans	Approved Approved Approved Approved
		Reported items ① Assessment results of the 2025 ICFR design ② External review results for the Q2 2025 consolidated financial statements	
Oct. 21, 2025	3/3	Reported items ① Overview of IT audit and the ICFR	
Nov. 13, 2025	3/3	1. Authorization of audit and non-audit service agreements for consolidated business 2. Internal audit results for the Q3 2025 consolidated financial statements	Approved Approved
		Reported items ① Outcome of external review of the Q3 2025 consolidated financial statements ② Outcome of diagnostic assessment on the progress of new business investments	
Dec. 8, 2025	3/3	1. Authorization of audit service agreements for POSCO Holdings and its consolidated group entities	Approved
Feb. 2, 2026	3/3	1. 2025 evaluation of the ICFR operational status 2. Authorization of audit and non-audit service agreements for POSCO Holdings and its consolidated group entities 3. 2025 Audit Committee activities	Approved Approved Approved
		Reported items ① 2025 ICFR operational status	
Feb. 26, 2026	3/3	1. Authorization of non-audit service agreement for POSCO 2. 2025 year-end consolidation internal audit result 3. 2025 internal audit result and 2026 plan 4. Deliberation on AGM agenda items	Approved Approved Approved Approved as amended
		Reported items ① 2025 year-end consolidation external audit result	
Mar. 24, 2026	3/3	1. Appointment of the chair of the Audit Committee	Approved

※ Approved: 25 items, Approved as amended: 1 item, Rejected: 0 items

Board Activities in 2025 (up to Q1 2026)

Board Committee

Finance Committee

Date of Meeting	Attendance	Agenda	Result
Jan. 23, 2025	4/4	1. 2025 financing plan	Deliberated
May 8, 2025	4/4	1. Participation in rights offering (POSCO FUTURE M) 2. Participation in rights offering (POSCO Pilbara Lithium Solution)	Deliberated Deliberated
Jul. 2, 2025	4/4	1. Disposal of equity stakes in ZPSS and QPSS	Deliberated
Aug. 12, 2025	4/4	Reported items ① 2025 consolidated management performance outlook and financial risk analysis ② Financial impact of rights offerings at three energy materials entities	
Nov. 5, 2025	4/4	1. Investment in Australian lithium mines	Deliberated
Dec. 8, 2025	4/4	1. 2026 bond issuance limit	Deliberated

※ Preliminary review of all items

CEO Candidate Pool Management Committee

Date of Meeting	Attendance	Agenda	Result
May 8, 2025	6/6	1. 2025 1H result on candidates pooled for the Representative Director & CEO position 2. Development plan to groom internal CEO candidate pool	Approved Approved
Nov. 27, 2025	6/6	1. Result of candidates pooled for the Representative Director & CEO position	Approved

※ Approved: 3 items, Approved as amended: 0 items, Rejected: 0 items

Board Consultative Bodies

Board Sessions

Date of Meeting	Session	Key Topics
Apr. 18, 2025	Strategy	Review of the Steel business global growth strategy, LNG business promotion strategy, and the current state and future strategy of the Energy Materials business
Jul. 3, 2025	ESG	Lecture delivered by an ESG experts and discussions engaged on key issues in supply chains, human rights management, and decarbonization
Nov. 11, 2025	Strategy & Performance Review	Establishment of group-wide mid- to long-term strategies and the 2026 consolidated business plan Review of business performance of the Steel, Energy Materials, and Energy sectors and discussions on mid- to long-term strategies for the Group Discussions to guide technology development for core businesses

Board Consultative Bodies

Outside Director Meetings

Date of Meeting	Attendance	Agenda
Feb. 3, 2025	6/6	Breakfast meeting with Steel/Rechargeable Battery industry experts
Jun. 5, 2025	6/6	Lecture delivered by professionals in corporate governance and discussion engaged on current items being addressed by the Board
Aug. 13, 2025	6/6	Lecture delivered by professionals in law regarding the impact of Commercial Act amendments and response measures
Aug. 22, 2025	6/6	Discussion on current items addressed by the Board
Oct. 17, 2025	6/6	Discussion on the impact of Commercial Act amendments and response measures Review of steel protectionist measures by country and their impact
Dec. 16, 2025	6/6	Discussion on the 2026 internal and external business outlook and breakthrough measures against risks observed in the Steel and Rechargeable Battery industries

Board Committee Roundtable

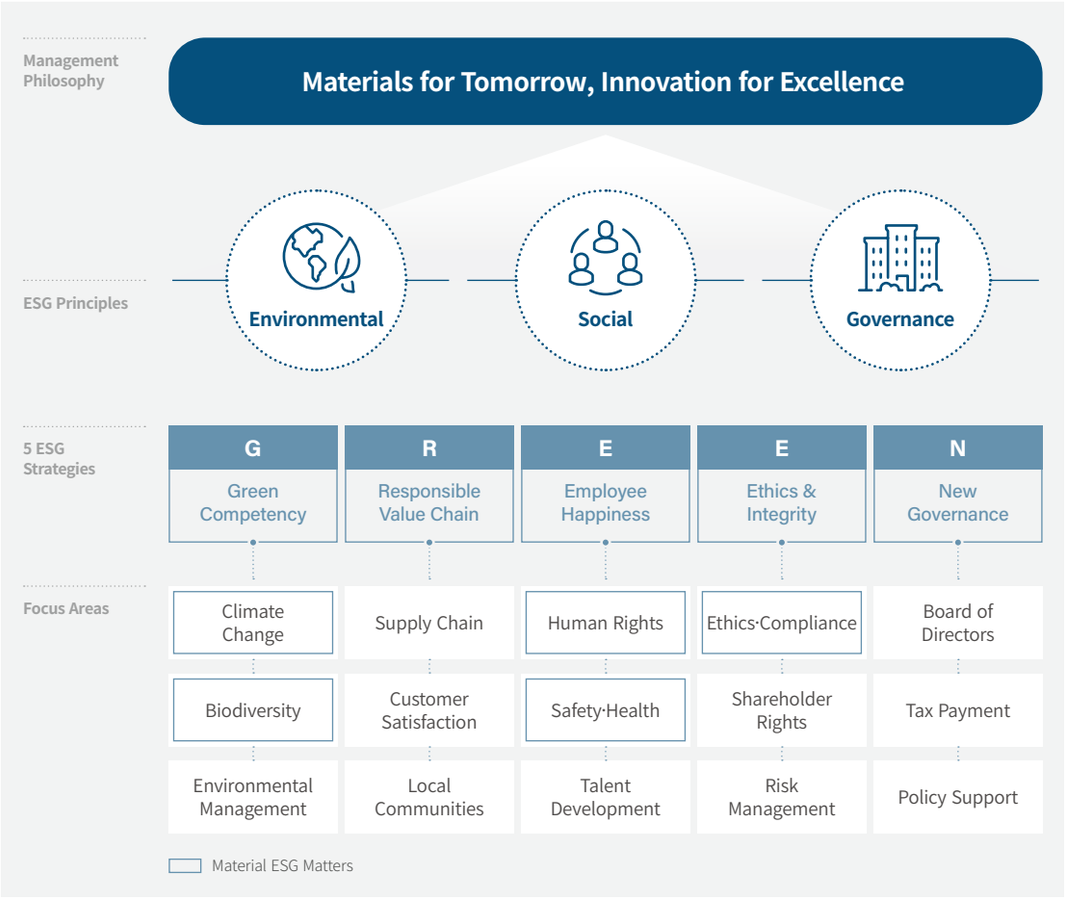
Should Board committees perceive the need for additional discussions and/or information regarding their operation, additional meetings are arranged.

Date of Meeting	Agenda
Jan. 22, 2025	1st Evaluation and Compensation Committee Meeting
Jan. 23, 2025	1st CEO Candidate Pool Management Committee Meeting
Jun. 5, 2025	1st Director Candidate Recommendation Committee Meeting
Jul. 9, 2025	2nd Director Candidate Recommendation Committee Meeting
Aug. 12, 2025	3rd Director Candidate Recommendation Committee Meeting
Aug. 13, 2025	2nd CEO Candidate Pool Management Committee Meeting
Oct. 21, 2025	2nd Evaluation and Compensation Committee Meeting
Jan. 12, 2026	1st CEO Candidate Pool Management Committee Meeting

ESG Strategic Framework

Corporate Vision

POSCO group's ESG strategy framework reinforces its commitment to achieving its corporate vision of "Materials for Tomorrow, Innovation for Excellence."



ESG Strategies

POSCO group defines ESG management as our mandate to minimize environmental impact, build sustainable communities, and practice advanced corporate governance. Our commitment is manifest in the G.R.E.E.N. framework, which defines five (5) strategic pillars.

Green Competency

POSCO group will enhance energy efficiency over conventional methods and adopt technologies that progressively reduce process-level GHG emissions to address climate change. In this effort, the Company will take a structured lifecycle-aligned approach to monitor and mitigate environmental impact, thereby shaping a sustainable future where humanity and nature can flourish in unison.

Responsible Value Chain

POSCO group will foster sharing and collaboration across the business value chain. We will extend our support to every business partner, so they can strengthen their ESG capabilities by improving low-carbon technologies, protecting human rights, and guaranteeing workplace safety.

Employee Happiness

Committed to offering a safe workplace where there is a culture of respect for human rights and diversity, we intend to create a vibrant company that encourages creativity in its people to command leadership in a transformative world.

Ethics & Integrity

To maintain the highest ethical standards in the entire business decision-making process, POSCO group will continue to enhance ethics and compliance and establish order to promote fair trade.

New Governance

The Company will uphold the independence, expertise, and diversity of the Board, as well as prioritize shareholder rights and transparency to reach new heights in advancing our corporate value.

ESG Governance Framework

As the holding company, POSCO Holdings operates a single and unified channel through which group-wide sustainability-related initiatives are managed to communicate our message as One Voice. When sustainability-related risks and opportunities are identified at affiliated companies, they are discussed at the Group ESG Working-Level Consultative Body. Then, they are escalated to the Group ESG Council and the ESG Committee before the Board is briefed. The outcomes of Board discussions are then incorporated into management activities.

Board and ESG Committee

At POSCO Holdings, the Board has ultimate oversight and responsibility for sustainability-related risks and opportunities. It deliberates on and approves the group-wide strategy and key decisions on ESG matters. To ensure professional review and constant oversight of ESG issues, the Board maintains the ESG Committee, to which all associated responsibilities are delegated. Pursuant to the Board regulations, the ESG Committee regularly reviews material ESG issues. In 2025, the committee held regular and ad hoc meetings to deliberate on key agenda items in order to advance the group-wide ESG governance. The agenda included plans to establish the Environmental Stewardship Advisory Committee, develop the ESG internal control system, commit to the Group Human Rights Management Declaration, and publish the Sustainability Report (including of the double materiality assessment results).

ESG Session

The ESG Session is a regular annual meeting where the Board and the group's top management engage in in-depth discussions on ESG agenda items. The Board and the CEO of key affiliated companies attend the session, in which the group-wide mid- to long-term ESG strategies are reviewed and the current state and response measures for material ESG topics, such as climate change, safety and health, human rights, are discussed.

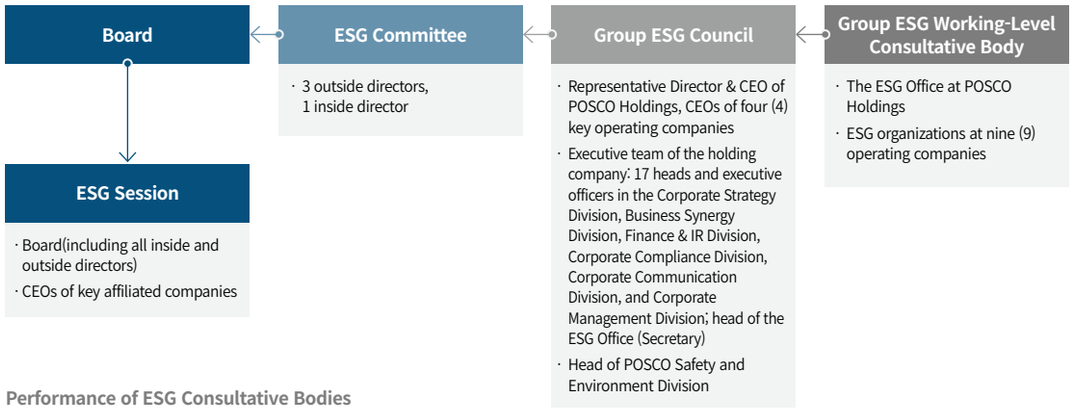
Group ESG Council

The Group ESG Council is a semiannual C-level consultative body that coordinates ESG issues across the business group. The Council reviews the ESG initiatives defined by each affiliated entity. Furthermore, the CEO of each operating company and key Division heads, namely, Corporate Strategy, Business Synergy, Finance & IR, Corporate Compliance, Communication, Management Support, are invited to collectively discuss key issues. Through the Group ESG Council, the outcome of discussions at the Board of POSCO Holdings and the ESG Committee are communicated to each affiliated company to be incorporated into their business activities.

Group ESG Working-Level Consultative Body

The Group ESG Working-Level Consultative Body is a working-level standing consultative body represented by the holding company and nine (9) operating companies. Group-wide ESG issues are shared and response measures are formulated at this consultative body. Material risks and opportunities are submitted as agenda items to be discussed by the Group ESG Council and to serve as reference for the C-level decision-making process. It also assists in enhancing ESG capability of each operating company and facilitates integrated response to group-wide ESG ratings and evaluations.

ESG Governance Structure


Board
ESG Committee
Group ESG Council
Group ESG Working-Level Consultative Body
· 3 outside directors, 1 inside director
· Representative Director & CEO of POSCO Holdings, CEOs of four (4) key operating companies
· Executive team of the holding company: 17 heads and executive officers in the Corporate Strategy Division, Business Synergy Division, Finance & IR Division, Corporate Compliance Division, Corporate Communication Division, and Corporate Management Division; head of the ESG Office (Secretary)
· Head of POSCO Safety and Environment Division
· The ESG Office at POSCO Holdings
· ESG organizations at nine (9) operating companies
ESG Session
· Board(including all inside and outside directors)
· CEOs of key affiliated companies

Performance of ESG Consultative Bodies

Consultative Body	Date of Meeting	Details	
ESG Session	Jul. 3, 2025	· Changes in global ESG developments and the response strategies · Progress and plan for supply chain-wide ESG management	· Formation of the group-wide human rights management system and action plans · Results of rolling out of the group-wide decarbonization roadmap
Group ESG Council	May 14, 2025	· Rolling-out plan for the Group's decarbonization goals · Progress and plan for supply chain ESG management	· Formation of the group-wide human rights management system and action plans · POSCO Holdings Sustainability Report publication schedule
	Sep. 19, 2025	· POSCO 2050 dual decarbonization roadmap · Results of the 2025 human rights impact assessment (HRIA) across POSCO's domestic business sites	· Changes in ESG policy of the new government administration and POSCO group's response · Sustainability disclosures; understanding investors' use of the information and the resulting implications
Group ESG Working-Level Consultative Body	Mar. 6, 2025	· Action plan for group-wide double materiality assessment · Group-wide ESG data verification measures	· Outcome of the Human Rights Management Consultative Body activities and operation plan
	Oct. 20, 2025	· Measures to advance internal control over group-wide ESG data · 2026 HRIA plan for overseas subsidiaries	· Publication schedule for the group-wide sustainability report

ESG Office

The POSCO Holdings ESG Office is an organization dedicated to and responsible for the group-wide management of sustainability. The body generates connections and coordinates the inherent functions performed by different ESG groups, namely, the ESG Committee, the Group ESG Council, and the Group ESG Working-Level Consultative Body. The ESG Office also ensures consistency in ESG strategies across POSCO holdings and affiliated companies; furthermore, it formulates integrated response to group-wide ESG issues.

* Among the topic-specific disclosures for the material topics selected during the reporting period, information related to the highest decision-making body in the governance area has been integrated into the Board and Board Committees section on this page to avoid duplication. The disclosure pages for each topic therefore begin with the organizational structure below the management level.

Double Materiality Assessment

POSCO Holdings has conducted double materiality assessments since 2022, marking the fifth year of implementation to identify stakeholder needs and expectations and reflect them in its ESG management strategy. Following last year's portfolio reshaping around the "2 Core + New Engine," POSCO Holdings selected Group-level material ESG topics alongside material ESG topics for three business sectors: steel, rechargeable battery materials, and infrastructure. This has created a basis for each business sector to make more effective management decisions on the ESG topics it faces. The ESG topic pool was built by incorporating agenda items discussed by the Group ESG Council, chaired by the Representative Director & CEO, as well as matters identified through direct communication with key stakeholders, including ESG non-deal roadshows (NDRs), conference calls, and emails. POSCO Holdings then identified risks and opportunities and analyzed both the its impacts on society and the environment (inside-out) and the impacts of external factors on POSCO group (outside-in). At the 5th Stakeholder Roundtable, which brought together investors, academia, government agencies, customers, suppliers, and employees, POSCO Holdings held in-depth discussions on ESG topics that require priority management. The five (5) material ESG topics identified through this process are managed systematically in alignment with the Group's mid- to long-term strategies. The management status of each topic will be disclosed transparently each year through the Sustainability Report.

Double Materiality Assessment Process

Step 01 Pooling of ESG Topics

- Set the scope of business activities and value chains subject to double materiality assessment, reflecting the Group's strategic direction and stakeholder perspectives
- Select a common pool of material ESG topics for POSCO group through cross-analysis of ESG topic pools by affiliated companies

Definition of key Business Sectors	Value Chain Analysis
Steel	Upstream
Rechargeable Battery Materials	Own operations
Infrastructure	Downstream

Sustainability Topic Pool

- Map ESG disclosure and assessment standards[1]
- Analyze stakeholder inquiries including investors
- Analyze material reporting topics of peer groups

Reporting topic pool Common topic pool for POSCO group → Select topics subject to identification and assessment

Derive a list of 21 topics

Step 02 Identification of Impacts, Risks, and Opportunities (IROs)

- Review external disclosure materials (e.g., business reports, IR materials, websites), media research, key stakeholder inquiries, and relevant laws and regulations
- Identify environmental and social impacts as well as financial risks and opportunities
- Determine assessment methods according to impact characteristics

Identification of IROs[2]

Internal materials: Business reports, corporate governance reports, stakeholder inquiries, etc.
External materials: Laws and regulations, industry trends, media coverage, etc.

Impact Materiality	Financial Materiality
Company impact on society and the environment	Financial impact of external factors[3] on the Company
Positive / Actual	Risk
Negative / Potential	Opportunity

Identify topic-specific IROs and develop double materiality assessment indicators

Step 03 Assessment of IROs

- Prioritize IROs[2] through assessments of both impact materiality and financial materiality
- Conduct internal stakeholder assessments based on surveys targeting the Group ESG Working-Level Consultative Body and major departments at POSCO Holdings
- Conduct external stakeholder assessments based on surveys conducted by external agencies and stakeholder roundtables

IRO[2] Assessment

Impact Materiality Indicators	
Scale	Magnitude of impacts on the environment and society
Scope	Geographical/physical scope of impacts on the environment and society
Remediability	Extent to which negative environmental and social impacts can be restored
Likelihood	Likelihood of potential impacts
Financial Materiality Indicators	
Scale	Magnitude of financial impacts of risks and opportunities (e.g., revenue, costs, assets)
Likelihood	Likelihood of risks and opportunities

Aggregate IRO assessment results

Step 04 Selection of Material Topics

- Derive material topics from the inside-out and outside-in perspectives based on the established assessment score thresholds
- Report identified material topics to the Board for final confirmation
- Integrate selected material topics in the process of formulating enterprise risk management strategies

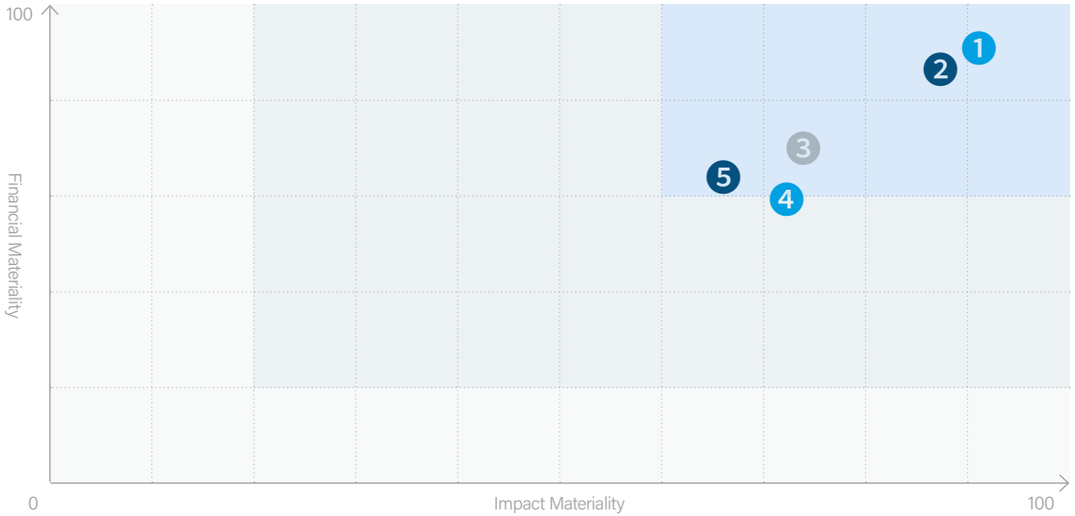
Prioritization by Topic

Set thresholds and rank by topic → ESG departments and management conduct reviews for final approval → Monitor ESG strategy action plans / Include in sustainability reports

Finalize material reporting topics

1) MSCI(Morgan Stanley Capital International) ESG Rating, Sustainalytics ESG Risk Rating, ISS(Institutional Shareholder Services) ESG Rating, Korea Institute of Corporate Governance and Sustainability
2) IRO (Impact, Risk and Opportunity)
3) Laws, regulations, international community issues, etc.

Materiality Matrix



Environmental Social Governance

Ranking	Material Topic	Previous Year Ranking	Impact Materiality	Financial Materiality
1	Climate Change	1	90	93
2	Safety·Health	2	87	87
3	Ethics·Compliance	5	74	70
4	Biodiversity	8	72	60
5	Human Rights	4	66	65

Ranking	Material Topic	Category	Impact Materiality (Key Environmental and Social Impacts)	Nature of impact			Financial Materiality		Risk and Opportunity	
1	Climate Change	Environmental	· CO_2 emissions generated through coal/natural gas combustion and chemical reactions in steel manufacturing processes (e.g., blast furnaces, EAFs, and calcination furnaces) · Contribution to carbon reduction through HyREX, expansion of renewable energy generation, low-carbon construction technologies, low-carbon rechargeable battery materials, and smart factory/AI-based energy optimization	Positive and negative	Actual	Short-to long-term	· Mandatory disclosures of carbon costs in accordance with the Korea Sustainability Standards Board (KSSB) · Risk of increased export costs due to the introduction of global regulations such as the Carbon Border Adjustment Mechanism (CBAM)	· Securing market leadership and premium positioning for low-carbon products · Long-term reduction of energy costs through early procurement of renewable energy	Risk and opportunity	Short-to long-term
2	Safety·Health	Social	· Adverse impacts on worker health caused by industrial accidents, such as entrapment, falls, and burns resulting from high-temperature/high-pressure facilities, heavy material handling, and crane operations in steel manufacturing processes · Adverse impacts on worker health caused by safety accidents, such as falls, electric shocks, explosions, and exposure to hazardous substances during power facility operations, work at height on construction sites, and chemical handling	Negative	Actual	Short-to long-term	· Production disruptions and losses resulting from operational shutdowns caused by serious industrial accidents · Increased costs associated with legal liabilities, workers' compensation insurance, and other related expenses arising from serious industrial accidents	· Enhanced bid competitiveness through the demonstration of advanced safety management systems	Risk and opportunity	Short-to long-term
3	Ethics· Compliance	Governance	· Decline in trust among stakeholders, including customers, shareholders, employees, and local communities, and damage to organizational culture in the event of corruption or violations of laws and regulations · Damage to business partner relationships and deepening instability across the value chain due to anti-competitive practice, such as collusion and delayed or non-payment	Negative	Potential	Short-to long-term	· Financial impacts arising from sanctions and restrictions on business activities in the event of anti-corruption or unfair trade incidents · Increased regulatory compliance costs and impacts on financing conditions due to capital market confidence if internal controls are weak	· Mitigation of regulatory risks through enhanced internal control systems and improvement in capital-raising conditions resulting from improved ESG ratings · Reduction of future regulatory compliance costs and mitigation of compliance risks through the proactive establishment of AI governance	Risk and opportunity	Short-to long-term
4	Biodiversity	Environmental	· Deforestation, habitat destruction, and ecosystem disruption caused during mining activities, gas exploration, and palm plantation operations · Damage to green areas and biodiversity loss caused by large-scale site development during construction projects and data center construction	Negative	Potential	Short-to long-term	· Delays in lithium permits in Argentina and disruptions in Export Credit Agency (ECA) financing · Risk of exclusion from investment by global investors due to inadequate natural capital management	· Maintaining investor confidence and securing a stable foundation for capital raising through the early identification of nature-related risks based on the Taskforce on Nature-related Financial Disclosures (TNFD) framework · Proactive management of environmental risks and cost minimization through the establishment of a natural capital management system	Risk and opportunity	Short-to long-term
5	Human Rights	Social	· Improvement in employee satisfaction and retention of skilled talent through the expansion of the flexible working arrangement, operation of rest areas and health promotion programs, and enhancement of housing support and welfare	Positive	Actual	Short-to long-term	· Imposition of penalties in the event of non-compliance with the Corporate Sustainability Due Diligence Directive (CSDDD) · Risk of business suspension due to controversies over violations of Indigenous Peoples rights at overseas business sites	· Securing investor confidence through the establishment of a group-wide integrated due diligence system · Elevate brand value as a leading company in respect for human rights	Risk and opportunity	Short-to long-term

Material ESG Topic Index

Environmental Social Governance

Ranking	Material Topic	GRI	SASB	SDGs	TCFD
1	Climate Change	302, 305	EM-IS-110a.1 EM-IS-110a.2 EM-IS-130a.1 EM-IS-130a.2	7, 11, 12, 13	●
2	Safety·Health	403	EM-IS-320a.1	3, 8	-
3	Ethics·Compliance	205, 206	-	16	-
4	Biodiversity	101	-	14, 15	-
5	Human Rights	401, 402, 405, 406, 407	-	3, 5, 8, 10, 16	-

Material ESG Topics by Business Sector

Environmental Social Governance

[Steel]

Ranking	Material Topic	Impact Materiality	Financial Materiality
1	Climate Change	100	97
2	Safety·Health	93	100
3	Supply Chain	81	88
4	Human Rights· Talent Development	71	83
5	Environmental Management	63	84

[Infrastructure]

Ranking	Material Topic	Impact Materiality	Financial Materiality
1	Climate Change	100	100
2	Safety·Health	84	91
3	Supply Chain	58	92
4	Ethics·Compliance	63	76
5	Environmental Management	66	65

[Rechargeable Battery Materials]

Ranking	Material Topic	Impact Materiality	Financial Materiality
1	Climate Change	100	100
2	Environmental Management (Waste and Resource Circulation)	96	89
3	Safety·Health	69	96
4	Environmental Management (Air Pollution)	79	94
5	Human Rights (Social Dialogue and Collective Bargaining Rights of Own Workforce)	92	84

* These scores are relative indicators calculated within each business sector and are independently derived by each business sector. As industry characteristics, value chains, stakeholder composition, and financial impact pathways differ among the units, direct comparison of scores across business sectors for the same topic is not meaningful.

Stakeholder Communication

As the holding company, POSCO Holdings operates a group-wide ESG risk response system to help POSCO group address internal and external ESG risks effectively. Under this framework, the ESG Office of POSCO Holdings aggregates ESG issues received through various channels, develops response measures for key matters, and reports them to the Board. In 2025, POSCO Holdings received and engaged on a total of 154 ESG issues at the Group level through the ESG risk response system, including ESG NDRs, investor conference calls, and emails. This report faithfully presents major stakeholder inquiries and the status of related improvements.

Stakeholder Direct Communication Status

Category		Cases	Proportion
By area	Environmental	75	49%
	Social	61	39%
	Governance	18	12%
By issue	Climate Change	67	43%
	Supply Chain	43	28%
	Human Rights	9	6%
	Environmental Management	7	5%
	Board of Directors	7	5%
	Safety·Health	5	3%
	Ethics·Compliance	5	3%
	Shareholder Rights Protection	5	3%
	Local Communities	2	1%
	Biodiversity	1	1%
	Others	3	2%
By stakeholder	Investors/insurers	91	59%
	Customers/suppliers/partners	46	30%
	Others	17	11%

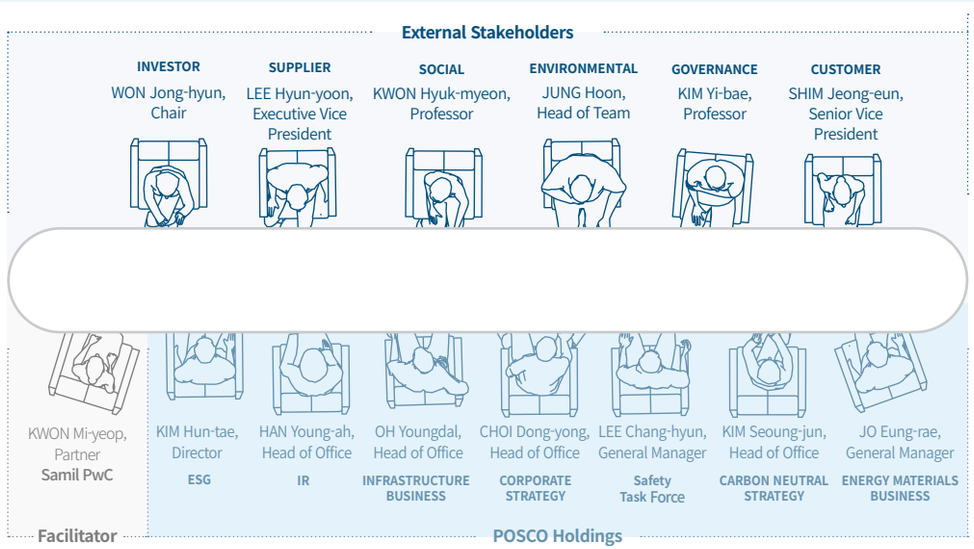
5th Stakeholder Roundtable

On February 2, 2026, POSCO Holdings held the 5th Stakeholder Roundtable at POSCO Center. The roundtable was designed to share POSCO group's strategies and performance on key ESG issues with stakeholders and to hear their views firsthand. With climate action and safety management set as core agenda items, participants held in-depth discussions on the role ESG should play in strengthening the competitiveness of the Group's key businesses, including steel, rechargeable battery materials, and infrastructure.

External participants included WON Jong-hyun, former Chair of the Stewardship Responsibility Expert Committee of the National Pension Service; JUNG Hoon, Head of the Future Industry Team at the National Assembly Futures Institute; KWON Hyuk-myeon, Professor at the University-Industry Foundation, Yonsei University; KIM Yi-bae, Professor of Accounting at Duksung Women's University; SHIM Jeong-eun, Senior Vice President of HD Korea Shipbuilding & Offshore Engineering; and LEE Hyun-yoon, Executive Vice President of Chosun Refractories. POSCO Holdings was represented by CHOI Dong-yong, Head of the Corporate Strategy Office; KIM Seoung-jun, Head of the Carbon Neutral Strategy Office; OH Youngdal, Head of the Infrastructure Business Management Office; HAN Young-ah, Head of the IR Office; LEE Chang-hyun, General Manager of the Group Safety Innovation Task Force; JO Eung-rae, General Manager of the Energy Materials Business Management Office; and KIM Hun-tae, Head of the ESG Office.

POSCO Holdings will reflect the stakeholder views gathered through the roundtable in POSCO group's ESG policies and strategies, while continuing to strengthen its response capabilities on key issues such as climate, safety, and human rights. The roundtable served as a meaningful opportunity to clarify the direction of future ESG activities and pursue sustainable development. POSCO Holdings will continue to practice transparent and trusted ESG management through regular communication with stakeholders.

Overview of Participants



2025 Activity Review

Q **Give us an overview of POSCO Holdings' key topics and achievements last year.**

A

POSCO HOLDINGS
KIM Hun-tae, Head of the ESG Office

Last year, POSCO group delivered the following outcomes across the four key issues raised by stakeholders: climate action, human rights, safety, and disclosure. In climate action, the HyREX demonstration project was selected as a national project, and the Group established a group-wide energy supply and demand strategy. The Group also operated the Group GX Council, which links the decarbonization strategy, energy, and policy functions, laying the groundwork for strategic synergies. In human rights, the Group established and operated a group-wide human rights management system by announcing the Human Rights Management Declaration under the leadership of the Group CEO and conducting human rights impact assessments. These efforts led to improvements in controversy assessments related to labor rights at its Türkiye operations and Indigenous Peoples rights in Myanmar. In safety, the Group established a Safety Innovation Task Force directly under the CEO, significantly increased the weighting of safety in operating company management evaluations, and developed comprehensive group-wide disaster prevention measures through external diagnostics. Implementation is now centered on on-site effectiveness. In disclosure, the Group moved early to introduce biodiversity and natural capital disclosures and reinforced its ESG data accountability management system through the ESG data portal. As a result, POSCO group ranked fourth globally and first in Korea in the World Benchmarking Alliance (WBA) Just Transition assessment, and 87th globally and first in Korea in nature-related disclosures.

POSCO Holdings Material Topics and Stakeholder Recommendations

Q **Tell us about POSCO Holdings' efforts to address climate issues and your expectations.**

A

POSCO HOLDINGS
KIM Seoung-jun, Head of the Carbon Neutral Strategy Office

POSCO group views carbon neutrality not as a mere regulatory response but as a strategic opportunity to strengthen industrial competitiveness and lead future markets. The Group implements mid- to long-term carbon neutrality roadmaps across Steel, Rechargeable Battery Materials, and Infrastructure and Energy. In Steel, POSCO group is preparing for the HyREX demonstration, expanding carbon-reduced fuels and raw materials, applying Oxygen Top & Bottom Blown Converters, and building large-scale Electric Arc Furnaces (EAFs). Together, these measures create a real options-based carbon-reduced production system that enables flexible responses to demand for carbon-reduced steel products. The Group is also helping shape global standards and certification systems for carbon-reduced steel to secure market trust and product value. In Rechargeable Battery Materials, POSCO group is making carbon reduction targets more attainable by shifting to renewable energy and responding to customers' RE100 and other supply chain requirements. It is pursuing renewable energy through energy efficiency improvements, rooftop solar, and direct PPAs, while developing a large-scale Carbon Free Energy (CFE) transition strategy linked to the national electricity supply and demand plan. Infrastructure and Energy is positioned as a core growth engine. POSCO group is reinforcing LNG, nuclear power, and renewable energy capabilities to strengthen profitability across the energy value chain, while reducing emissions through facility upgrades, hydrogen co-firing preparations, renewable energy business expansion, and global CCS initiatives. To stay ahead of policy changes, including full implementation of the EU CBAM, finalization of the 2035 NDC, and the 4th Phase of Korea's Emissions Trading Scheme (ETS), POSCO group operates the Group GX (Green Transformation) Council, with POSCO Holdings' Carbon Neutral Strategy Office as the control tower. POSCO group will build an economically viable and practical decarbonization ecosystem, creating "a sustainable future powered by decarbonized materials and energy."

Q Tell us about POSCO Holdings' efforts to address climate issues and your expectations.

A

POSCO HOLDINGS
JO Eung-rae, General Manager of the Energy Materials Business Management Office

The rechargeable battery market is being gradually reshaped by diverging regional EV demand and growing demand for ESS. POSCO group sees this not as a short-term fluctuation, but as a structural shift. The Group has secured raw material competitiveness through a diversified lithium supply chain centered on Australia and Argentina. Building on this base, it has continued to diversify its cathode product portfolio and strengthen R&D capabilities, enabling a flexible response to shifts in key customers' strategies and market demand. Domestic production facilities are being designed from the outset to reduce carbon emissions and minimize environmental impact. This strategic approach helps the Group stay ahead of tightening global environmental regulations and secure mid- to long-term competitiveness. On the technology front, high-nickel cathode materials and high-energy-density material technologies open the door to new applications beyond EVs, including humanoid robots. The Group is now making selective investments in areas where it can secure core competitiveness, while continuing R&D for next-generation products and processes. At the same time, process optimization and productivity gains are sharpening cost competitiveness and improving business stability and profitability.

A

POSCO HOLDINGS
OH Youngdal, Head of the Infrastructure Business Management Office

The energy business is a key growth axis for POSCO group and is being nurtured as a Next Core business that connects steel and energy materials. The spread of AI and faster electrification have recently driven a surge in power demand. Considering the conditions of Korea's power grid and infrastructure, there are practical limitations to achieving a full renewable energy transition in the short to medium term. Against this backdrop, POSCO group is pursuing a transitional energy mix strategy centered on low-carbon energy. LNG sits at the center of this transition strategy. Led by POSCO International, the Group is steadily expanding across the LNG value chain, from gas field development and LNG trading to terminal operations and power generation.

The newly established LNG trading corporation in Singapore is strengthening the Group's global trading capabilities. Through the Alaska LNG project, POSCO group has secured a strategic foothold in the North American market and is currently advancing the expansion of its gas business. The Group is also building a stable earnings structure by pursuing both domestic district power generation businesses and overseas LNG power generation businesses. In Renewable Energy, the Group currently operates onshore wind and solar power generation businesses and plans to scale up its portfolio in phases, with a focus on domestic offshore wind, overseas solar, and ESS. The Group is also moving on multiple fronts in energy transition and climate action, exploring new business opportunities such as LNG bunkering and CCS centered on the U.S. and Indonesia.

A

Supplier
LEE Hyun-yoon, Executive Vice President of Chosun Refractories

Refractories are core materials that directly affect equipment efficiency, energy use, and process stability across all stages of steel production. The performance and quality of refractories are closely tied not only to process efficiency, but also to energy savings and carbon emissions reduction. We understand POSCO's decarbonization transition and end-to-end localization strategy as more than a restructuring of its business model. It is a process of redefining roles and responsibilities across the supply chain. In an increasingly protectionist environment, this also marks an important turning point for core suppliers such as Chosun Refractories. For Chosun Refractories, end-to-end localization means delivering the same level of technology, quality, and supply stability in local markets. In step with POSCO's production expansion in growth regions such as India and the U.S., we are widening our global business base through joint overseas expansion and local collaboration. We are also upgrading our technologies to improve refractory performance and extend product life, contributing to higher process efficiency and lower energy consumption. At the same time, we support the on-site implementation of POSCO's decarbonization and localization strategies by securing competitiveness in both cost and quality. Going forward, Chosun Refractories will continue to advance supply chain-level carbon reduction and technological upgrades in line with POSCO's transition strategy, fulfilling its role as a strategic partner in addressing climate risks together.

A

Environmental
JUNG Hoon, Head of the Future Industry Team at the National Assembly Futures Institute

POSCO group is extending its decarbonization transition strategy beyond the steel industry into the energy business. Given the steel industry's heavy pressure to reduce GHG emissions and meet social expectations, I see the linkage of renewable energy and LNG as a reasonable direction. It is also notable that the Group is pursuing the transition through a diversified business portfolio, rather than relying on a single solution. However, there is still room for improvement in how these group-wide transition efforts are communicated externally. While some of this is shared through the Sustainability Report, environmental groups and the broader public may still feel that the scale and depth of the change have not been fully conveyed. In particular, overseas CCS and power generation projects need to be communicated more clearly as important pillars of the Group's decarbonization transition strategy, rather than as mere business expansion.

The steel industry's decarbonization transition is not a challenge that companies can solve on their own. Because process transitions such as HyREX and the buildout of related infrastructure require significant time and resources, social understanding of the realities of the transition process and continued communication are essential. At the same time, more specific discussions are needed on the scale of investment and infrastructure required for the low-carbon transition, alongside the buildout of national hydrogen supply chains and infrastructure. To that end, companies and governments need to define their respective roles and work together. Such joint efforts can drive real progress in the transition.

Q Tell us about POSCO Holdings' efforts to address safety issues and your expectations.

A

POSCO HOLDINGS
LEE Chang-hyun, General Manager of the Group Safety Innovation TF Team

Occupational Health and Safety (OHS) was the ESG area where the Group saw the most room for improvement last year, and it was a year that reaffirmed a simple truth: achievements cannot be sustained without safety. Although serious industrial accidents had been trending downward over the past five years, eight accidents occurred, making us feel a deep sense of social responsibility. We are therefore reexamining root causes and structural limitations and concentrating our capabilities on safety management innovation. Last August, the Group established a safety organization directly under the CEO and conducted intensive diagnostics across all business sites through the Group Safety Special Diagnostic TF Team. Based on the inspection results involving external experts and labor unions, the Group established comprehensive occupational accident prevention measures in December. The Group continues to share and discuss the details and progress with the government and the National Assembly. Beginning this year, the Group has transitioned the organization into the Group Safety Innovation TF Team, with its role focused on execution and implementation management. The comprehensive measures consist of approximately 40 implementation tasks. In addition to improving systems and processes, the Group is working to build risk management systems tailored to each business site and strengthen execution so that meaningful improvements take hold on the ground. The Group also recognizes workers as key agents of occupational accident prevention and is strengthening a participation-based safety management system built on labor-management cooperation. Guided by the principle that "preventing occupational accidents is safeguarding corporate value," POSCO group aims to redesign safety from the ground up and embed an execution-driven safety culture.

A

Social
KWON Hyuk-myeon, Professor at the University-Industry Foundation, Yonsei University

POSCO group operates steelworks where tens of thousands of people are stationed, as well as construction sites where many suppliers and external workers work together. Structurally, this puts the Group in an environment where safety management is highly complex. Given that risk factors exist across diverse processes and work environments, the Group's continued safety management efforts deserve recognition. At the same time, even a single serious industrial accident can now have a major impact on a company's overall ESG management, making it more important than ever to prevent serious accidents under any circumstances. In this respect, strengthening safety governance, conducting site-centered inspections, and building prevention systems based on worker participation point in the right direction.

I believe safety must ultimately evolve beyond technical and system-based controls into a culture. Because management-centered approaches have limits, it is important to recognize workers as key agents of disaster prevention and embed that awareness at operational sites. In that respect, the Group's move to strengthen recognition of workers as key agents of disaster prevention is a meaningful change. If this recognition translates into action on the ground, the foundation for preventing serious industrial accidents will become even stronger. It will also be important to establish a message that symbolizes POSCO group's own safety culture. An approach that connects safety with employee awareness, rather than rules alone, can help spread an autonomous safety culture. If POSCO group internalizes safety as its highest management priority and puts it into practice, I expect it to build a safety culture that can serve as a model for the broader industry.

Q Tell us about POSCO Holdings' efforts to address human rights issues and your expectations.

A

Customer
SHIM Jeong-eun, Senior Vice President of HD Korea Shipbuilding & Offshore Engineering

The shipbuilding industry has maintained global competitiveness in technology and quality, but management of human rights and working conditions across the supply chain is now emerging as a key issue beyond climate action. Given the industry's high share of supplier personnel and migrant workers in key processes, human rights is a structural management issue. Demand for supply chain due diligence is spreading rapidly among investors and global customers, and the shipbuilding industry also needs to respond to this shift. Major customers are increasingly treating human rights, alongside decarbonization, as an important criterion, making systematic responses essential. In this context, I believe POSCO group has been proactive in addressing human rights and supply chain issues. In particular, POSCO group's high global standing in the WBA Just Transition category serves as a credible benchmark for supply chain partners. Greater transparency around human rights due diligence results and improvement measures would also help customers manage supply chain ESG risks more systematically. Building on this, I expect POSCO group to lead supply chain-level ESG responses and further strengthen partnerships.

A

POSCO HOLDINGS
CHOI Dong-yong, Head of the Corporate Strategy Office

Last year, POSCO group established and operated a holding company-led human rights management system, elevating human rights from an issue managed by individual operating companies to a core Group-level management agenda. This laid the groundwork for human rights management to move beyond declaration and take root as a management system applicable across the Group. This year is about building on that foundation and taking the execution and risk management of human rights management to the next level. Expanding human rights impact assessments to overseas business sites and broadening the assessment scope to operating companies and suppliers is a natural next step toward more systematic management of human rights risks across the supply chain. From a disclosure perspective, stakeholder trust will increase if disclosures move beyond system descriptions and provide more specific information on due diligence processes and results. At the same time, as expanding the assessment scope to overseas business sites may increase operational burdens, the approach needs to balance efficiency and effectiveness through close cooperation with sites. If these efforts move in parallel, human rights management can quickly take root as a management system that works in practice at operational sites.

Q Tell us about POSCO Holdings' efforts to address risk management issues and your expectations.

A

Investor
WON Jong-hyun, Former Chair of the Stewardship Responsibility Expert Committee of the National Pension Service

The National Pension Service (NPS) is both an institutional investor that prioritizes financial returns and a public investor. As such, we are expected to balance profitability with social responsibility. ESG and stewardship activities are, in my view, part of the process of finding that balance. POSCO is one of the companies often cited in discussions of stewardship. POSCO's changes and improvement efforts in the areas of environment, fair trade, and governance are meaningful because they show that responsible investment can lead to tangible outcomes. At the same time, the nature of the steel industry makes energy use and high-risk processes unavoidable, creating structural risks in environment and safety. When accidents occur, the burden is even greater because expectations are high. NPS monitors ESG issues on an ongoing basis and engages with companies, with GHG emissions and serious industrial accidents set as priority management issues. The purpose is not to single out particular companies as problems, but to review how risks are managed and where improvement should head.
NPS takes a more stringent approach to safety. We look at corporate responses and improvement directions comprehensively, taking into account both the context of accidents and structural factors. We also monitor ESG "washing" concerns across ESG overall, but at this point we see POSCO as relatively distant from those concerns. We view engagement not as pressure, but as a cooperative process of finding a more sustainable path forward together.

A

POSCO HOLDINGS
HAN Young-ah, Head of the IR Office

The biggest shift the Company sees in investor communication is that interest is moving beyond individual incidents to how companies build and operate their overall risk management systems and governance. This trend has become increasingly evident in the recent IR environment as well. With disclosure obligations for serious industrial accidents strengthened and investor demands around stewardship code implementation growing, companies are now expected to provide a higher level of accountability and response. Against this backdrop, POSCO Holdings is strengthening disclosure and communication on risk management. In addition to fully complying with serious industrial accident disclosure requirements, the Company discloses safety indicators, including the Lost Time Injury Frequency Rate (LTIFR) and the number of serious industrial accidents, during quarterly earnings announcements, with the scope expanded to include suppliers. POSCO Holdings also goes beyond presenting figures by explaining improvement measures and management direction to deepen investor understanding. Its approach to investor communication is changing as well. Through ESG-focused NDRs for overseas investors, the Company has identified key areas of interest and specific requirements, and plans to extend this communication to domestic institutional investors. For agenda items related to voting rights, POSCO Holdings is gradually moving beyond simple disclosure toward explaining the background and criteria behind its decisions. Through these efforts, we believe it is important to communicate the Company's approach to risk management and its commitment to improvement more clearly to investors. Going forward, POSCO Holdings will continue to strengthen a trust-based risk management and communication system, moving beyond responding to changes in the investment environment.

Q Tell us about your expectations for POSCO Holdings regarding disclosure issues.

A

Governance
KIM Yi-bae, Professor at Duksung Women's University

For a global company like POSCO Holdings, the question is no longer whether to adopt sustainability disclosure, but how and to what level it will respond to mandatory disclosure requirements. Considering its asset size and business structure, POSCO Holdings inevitably sits at the center of this discussion, making depth and consistency in its response increasingly important.
In that regard, I believe POSCO Holdings is already well prepared. Building on its accumulated ESG management system and data foundation, POSCO Holdings needs to take sustainability disclosure one step further --not as a mere regulatory response, but as a strategic opportunity to strengthen trust with the market. Japanese companies also offer useful references. Since adopting sustainability disclosure systems relatively early, Japan has evolved toward linking disclosure with corporate strategy. This trend is instructive because it shows how disclosure can connect to corporate value, beyond simply releasing information. The key will be whether companies can use mandatory sustainability disclosure strategically, rather than responding defensively. The level of trust in the capital market will depend on how effectively companies narrow the gap between disclosure requirements and their ability to execute.

Material Topics

1. Climate Change 37
2. Safety·Health 46
3. Ethics·Compliance 52
4. Biodiversity 57
5. Human Rights 66

View of the Shinan Green Energy onshore wind farm operated by POSCO International

Climate Change

GOVERNANCE*

Organizational Structure

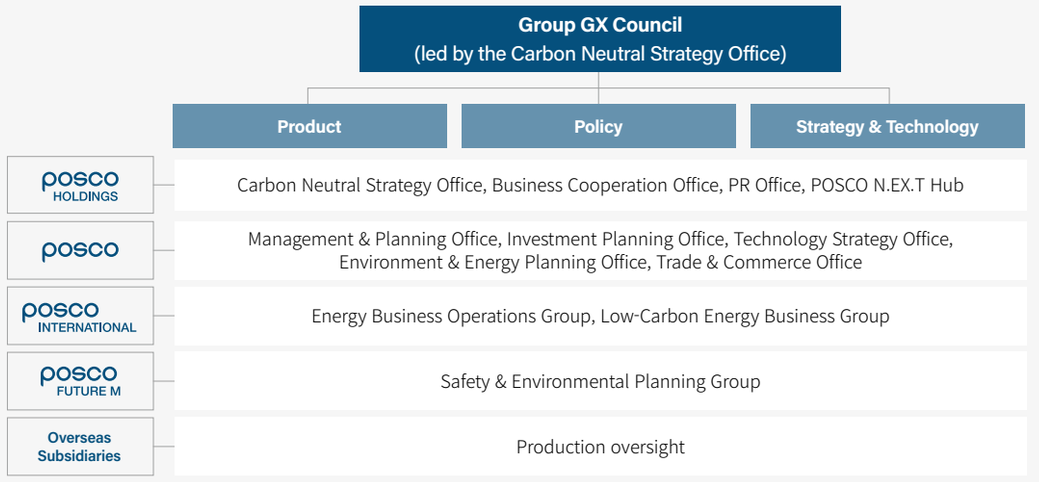
Group ESG Council

POSCO Holdings recognizes climate change as both a core group-level risk and a strategic opportunity in the era of low-carbon transition. The Company pursues a comprehensive response system across all business activities, to establish and monitor greenhouse gas (GHG) reduction targets, advance group-wide execution systems and expand investment in low-carbon facilities. The Group ESG Council convenes semiannually and the Group Management Meeting quarterly to review updates on carbon management at key operating companies. Climate-related risks, scenario analyses, and the progress toward emission reduction targets are reported to the Board of Directors (Board).

Group GX Council

Under the leadership of the Carbon Neutral Strategy Office, POSCO Holdings operates the Group Green Transformation (GX) Council to monitor decarbonization progress and ensure alignment of the group-wide strategy. The Council regularly reviews key decarbonization initiatives across the Group, spanning investment, production, and R&D. It also resolves cross-functional issues to advance effective decarbonization at the Group level. In 2025, the Council focused on the review of timelines for decarbonization technology development and commercialization, alongside GX initiatives designed to maximize group-wide synergies. A more cohesive group-wide decarbonization strategy was defined through the council discussions.

Composition of the Group GX Council


Group GX Council
(led by the Carbon Neutral Strategy Office)
Product
Policy
Strategy & Technology
POSCO HOLDINGS
Carbon Neutral Strategy Office, Business Cooperation Office, PR Office, POSCO N.EX.T Hub
POSCO
Management & Planning Office, Investment Planning Office, Technology Strategy Office, Environment & Energy Planning Office, Trade & Commerce Office
POSCO INTERNATIONAL
Energy Business Operations Group, Low-Carbon Energy Business Group
POSCO FUTURE M
Safety & Environmental Planning Group
Overseas Subsidiaries
Production oversight

* Other departments may join discussions as needed, depending on the agenda

Dedicated Organization

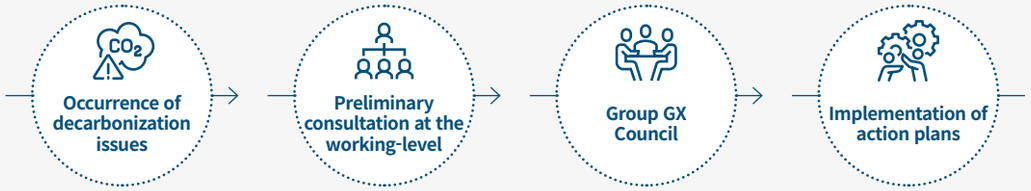
To achieve 2050 Net Zero, POSCO Holdings operates the Carbon Neutral Strategy Office under the Corporate Strategy Division to serve as the control tower for the Group's decarbonization initiatives. Aligned with evolving internal and external conditions, the Carbon Neutral Strategy Office formulates group-wide decarbonization strategies. It also reviews and resolves issues arising at each operating company to strengthen execution. The Office oversees integrated carbon reduction efforts across the Group, working closely with dedicated decarbonization teams at key operating companies, including POSCO, POSCO International, and POSCO Future M. These companies account for the majority of the Group's domestic GHG emissions.

Key Roles

Formulate group-wide decarbonization strategy	Manage the 2050 Net Zero roadmap	Review and resolve emissions reduction issues at each operating company	Coordinate decarbonization investments, production, and R&D through the GX Council

Control and Procedures

Workflow


Occurrence of decarbonization issues
Preliminary consultation at the working-level
Group GX Council
Implementation of action plans

Group affiliates and overseas subsidiaries	POSCO Holdings (Carbon Neutral Strategy Office)	POSCO Holdings (Carbon Neutral Strategy Office)	Group affiliates and overseas subsidiaries
· Suggest means to collaborate, make decisions, and offer support	· Define agenda and identify companies that will attend	· Hold executive-level discussions · Review strategy, set priorities, and identify general decision-making guidance	· Report to the management and implement action plan

* For details on the highest decision-making body for climate-related matters, see "ESG Governance Framework > Board and ESG Committees".

STRATEGY

Risk and Opportunity

Time Scope

POSCO Holdings' approach to climate-related risks and opportunities is integrated management aligned with the group's key decision-making cycle. Under its long-term vision, the Company uses its phased plan for applying decarbonization technology and its business transition roadmap toward 2050 Net Zero as guidelines to respond nimbly to changes in the domestic and international business environment. Despite uncertain market conditions, the Company will continue to review and update its GHG reduction targets and transition plans to minimize climate-related risks and expand on opportunities offered by the low-carbon transition.

Identification of Climate-Related Risks and Opportunities

Type			Risk and opportunity	Description	Our Response	Applicable Sector
Risk	Transition	Policy & regulation	Strict ETS[1] tightening and free allowance phase-out	Increased cost of purchasing emission permits as the 4th Phase of K-ETS allocation plan takes effect and the number of preliminary free allocations is reduced	Introduce internal carbon pricing; devise GHG emission forecasting/reduction plans; blast furnace-based carbon reduction technology	Steel
			Full enforcement of CBAM[2]	Carbon cost imposed on steel exports from 2026, with CBAM in full effect	Commence construction of a 2.5 Mt EAF in Gwangyang; develop technologies to produce premium steel using EAFs	Steel
			Expanded CCS[3] mandates at power plants	Rising pressure to invest in decarbonization as a result of CCS mandates on key power facilities, e.g., LNG combined-cycle power plants	Explore onshore and offshore CO_2 storage sites in Indonesia and pursue partnerships	Infrastructure
		Market	Increasing demand for carbon-reduced steel	Need for timely response to the growing demand for carbon-reduced steel	Develop low-HMR[4] and molten scrap EAF charging technologies; produce premium steel using EAFs	Steel
			Expanding demand for EV battery materials	Surging demand for high-purity carbon-reduced precursors and lithium	Sign long-term contracts; develop direct lithium extraction technology; establish demand forecast-based strategies	Rechargeable battery materials
			Intensifying competition over global raw material supply chains	Accelerating global rivalry to secure raw materials, e.g., pellets, HBI[5]	Overseas HBI Project Investment Review; expand scrap collection and sorting centers	Steel
		Technology	High investment costs for hydrogen-based steel making	Long-term assessment needed for HyREX[6] and conversion of relevant facility which require sizeable investment	Build HyREX demonstration facility	Steel
			Technological limitations in upgrading EAF steel for Premium steel production	Constraints of smelting technology to produce premium steel using EAFs	Develop technologies to produce premium steel using EAF	Steel
			Ambiguity of CCUS[7] technology	Technological ambiguity in CCUS efficiency and whether it can be applied to battery production	Engage in government-funded CCUS projects; expand demonstration-scale research	Steel & rechargeable battery materials
		Reputation	Failure to respond to greenwashing risks	Exaggerated promotional claims can impair investor trust and ESG ratings	Environmental Stewardship Advisory Committee; internalize ESG disclosure practices; enhance investor communication	Group-wide
	Physical	Acute	Coastal flooding and river overflow	Recurring flooding risks at Naengcheon Stream in Pohang and along the coast of Gwangyang	Establish BCPs[8]; build water barriers and enhance drainage infrastructure	Steel
			Heavy rainfall and climate disasters	Facility shutdowns and shipment delays caused by climate disasters	Update disaster response manuals; secure emergency equipment; provide response training to partner companies	Rechargeable battery materials
		Chronic	Extreme temperatures and drought	Reduced productivity due to shortages of cooling and process water	Improve groundwater utilization; expand climate adaptation investment	Rechargeable battery materials
Opportunity	Transition	Products & services	Growing demand for carbon-reduced products	Growing demand driven by the expansion of EV and renewable energy sectors	Develop carbon-reduced steel, high-performance cathodes, and RE100-certified products; expand global certifications	Steel & rechargeable battery materials
	Resource Efficiency		Facility efficiency and use of scraps and by product gas	High-efficiency facilities and energy savings	Upgrade steam power generation; optimize hot air control; enhance by-product gas recovery	Steel
	Recovery Resilience		Enhanced supply chain and energy resilience	Need for systems to address climate-related risks	Expand solar power; utilize overseas PPAs[9]; transition to LNG-hydrogen co-firing	Group-wide

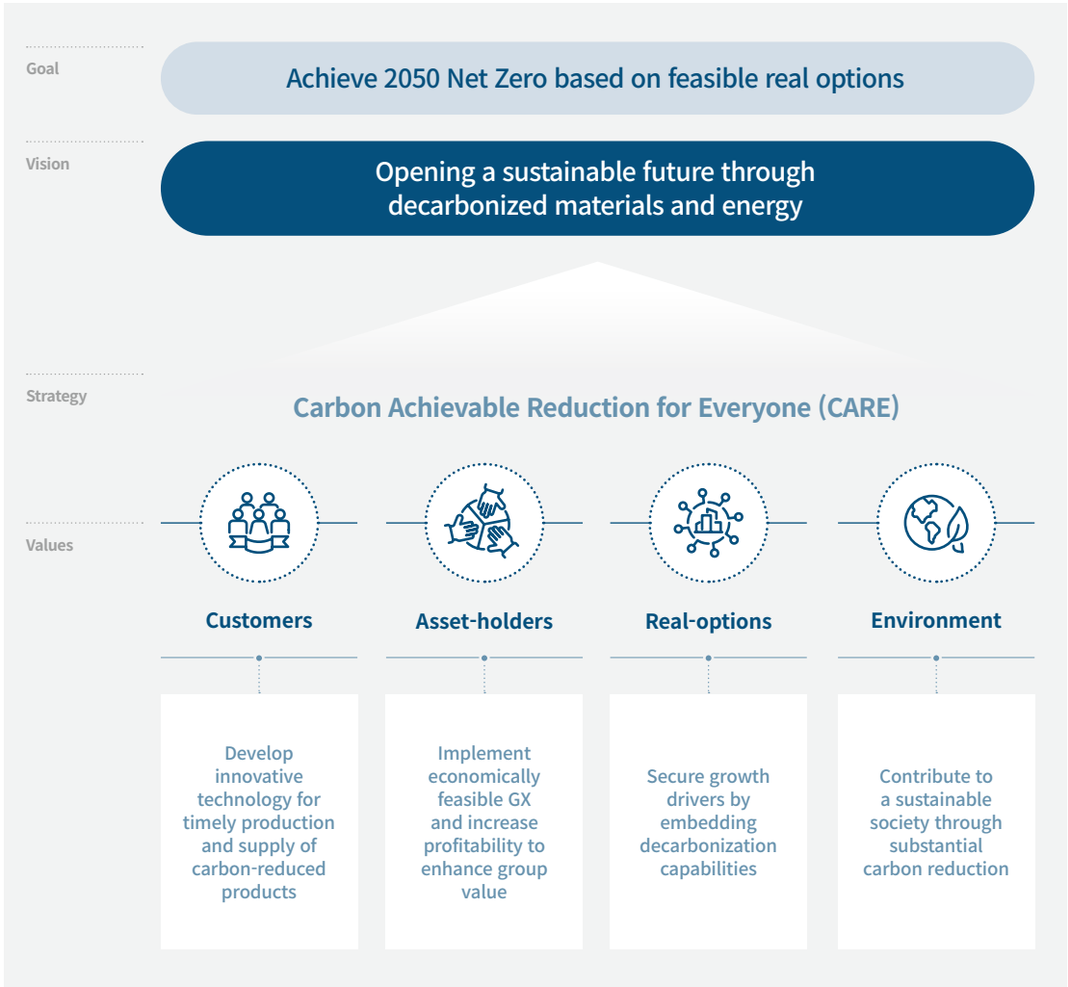
1) Emissions trading scheme
2) Carbon Border Adjustment Mechanism
3) Carbon capture and storage
4) Hot metal ratio
5) Hot briquetted iron
6) HyREX (Hydrogen-based reduction ironmaking technology)
7) Carbon capture, utilization, and storage
8) Business continuity plan
9) Power Purchase Agreement

STRATEGY

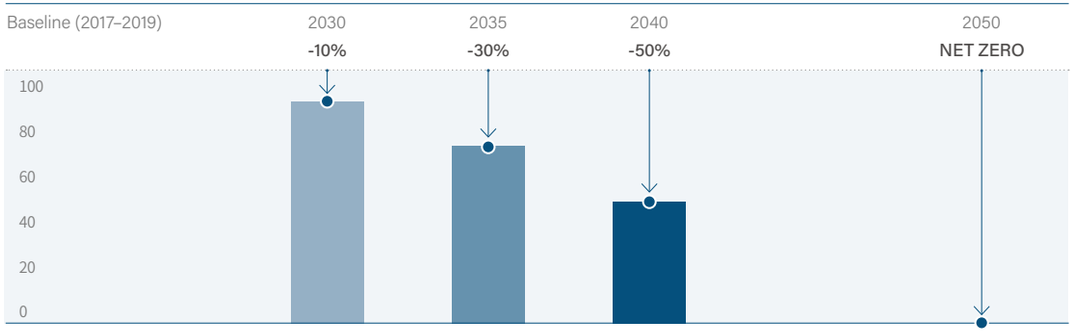
Strategy and Countermeasure

Formulation of group-wide Decarbonization Strategy and Roadmap

In line with the Group's 2050 Net Zero goal, POSCO Holdings develops and implements decarbonization roadmaps tailored to each company's profile. These roadmaps focus on POSCO, POSCO International, and POSCO Future M, which account for the majority of carbon emissions across the steel, infrastructure and rechargeable battery materials businesses. In 2024, the Company expanded the scope of roadmap reviews to include key overseas steel sites. In 2025, POSCO Holdings established a group-wide decarbonization vision and targets. Each operating company sets phased reduction targets aligned with industry-specific characteristics and Nationally Determined Contribution (NDC) pathways. POSCO Holdings continues to refine the integrated roadmap as market and technology conditions evolve.

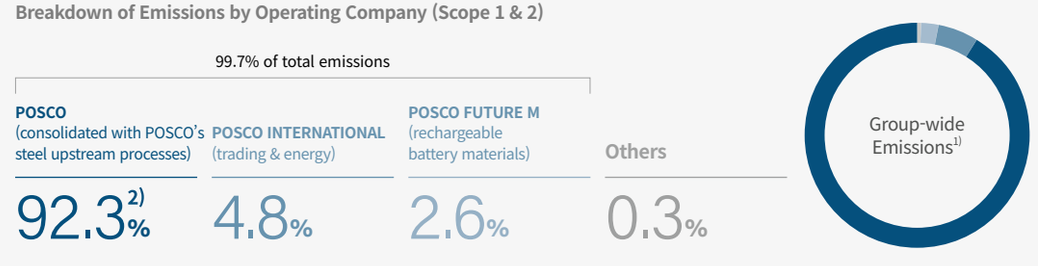

Goal
Achieve 2050 Net Zero based on feasible real options
Vision
Opening a sustainable future through decarbonized materials and energy
Strategy
Carbon Achievable Reduction for Everyone (CARE)
Values
Customers
Asset-holders
Real-options
Environment
Develop innovative technology for timely production and supply of carbon-reduced products
Implement economically feasible GX and increase profitability to enhance group value
Secure growth drivers by embedding decarbonization capabilities
Contribute to a sustainable society through substantial carbon reduction

Group Carbon Reduction Target



Unit	Key Strategy
Steel	· Develop carbon reduction technologies for the BF-BOF process and secure carbon-reduced fuels/raw materials · Advance EAF technology for carbon-reduced steel production · Lay the foundation for HyREX demonstration and commercial transition
Infrastructure	· Promote hydrogen co-firing and mono-firing power generation, CCS, and renewable energy projects
Rechargeable battery materials	· Improve energy efficiency of facilities/processes; secure PPAs and RECs

Breakdown of Emissions by Operating Company (Scope 1 & 2)



1) Combined total of the business group's top 10 domestic operating companies and overseas steel upstream production
2) Including overseas upstream production (PT.KP and PY.VINA).

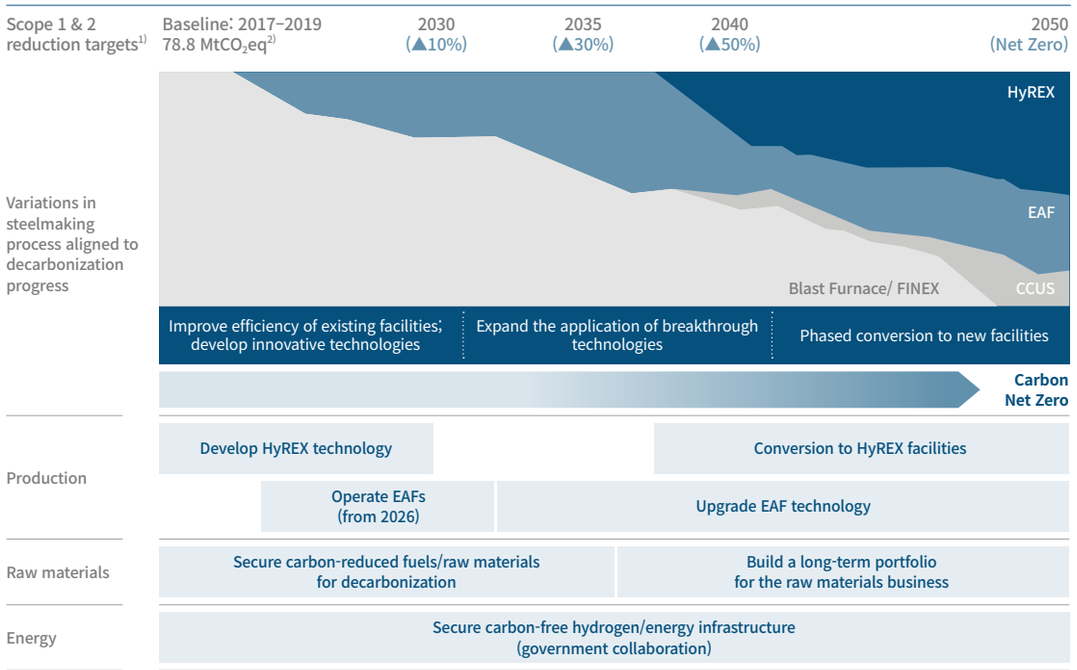
[Steel]

In the steel business, the Company has defined a mid- to long-term strategy with specific action plans across decarbonization technology, fuel, and raw materials, and energy in line with the 2050 Net Zero goal. To ensure that the strategy translates into tangible outcomes, the Company closely assesses the business performance as well as internal and external conditions to monitor implementation progress. Strategic alignment with the NDCs is kept in check to ensure consistency.

The ultimate goal is to utilize HyREX, which requires stable carbon-free hydrogen and power supply chain in addition to facility conversion at a large scale. Hence, it will take time to systematically prepare for commercialization. In the meantime, a feasible decarbonization roadmap is in motion that implements blast furnace- and converter-based bridge technology to deliver immediate carbon reduction results.

In the short term, POSCO will implement blast furnace- and converter-based carbon-reduction technology, such as hydrogen-enriched gas injection for the BF and Oxygen Top-and-Bottom Blown (OTBB) converter, while expanding the deployment of EAFs. In the mid- to long-term, decarbonization of the steelmaking process will be advanced in stages through HyREX, which uses hydrogen as a reducing agent.

POSCO Decarbonization Roadmap



1) The timelines above can be adjusted depending on local and global circumstances
2) Average of the total emissions from POSCO's domestic operations measured between 2017 and 2019

1. Blast Furnace- and Converter-based Carbon Reduction Technology

Carbon-Reduced Raw Materials Pellets are produced by shaping iron ore into uniformly sized spherical form. Compared to irregular sintered ore, they allow gases to flow more effectively, reducing fossil fuel consumption. Hot Briquetted Iron (HBI) is produced by removing oxygen from iron ore and compressing it into briquette form—contributing to less coal consumption. The use of scrap iron lowers carbon emissions by skipping the molten iron production process.

Hydrogen-Enriched Gas Injection into the Blast Furnace When natural gas is injected into a blast furnace instead of coking coal, methane, the main component of natural gas, breaks down into carbon monoxide and hydrogen. Injected into the bottom of the blast furnace, these gases serve as reducing agents to lower coking coal consumption. In the first half of 2023, POSCO installed natural gas injection equipment in its blast furnace and confirmed the carbon reduction impact. Using this gas injection equipment, POSCO is developing hydrogen injection technology for blast furnace application.

Molten Scrap Charging Molten scrap charging method maximizes scrap ratio in the blast furnace-converter process by melting scrap before charging it into the converter. EAFs reduce coal and iron ore consumption by using recycled scrap, but face constraints in producing premium steel due to difficulty in impurity control. POSCO plans to reduce carbon emissions by using this technology to replace molten iron from the blast furnace until it secures the technology to produce premium steel using EAFs.

Oxygen Top & Bottom Blown (OTBB) Converter Technology OTBB converter technology blows oxygen from both the top and bottom of the converter to secure additional heat sources. Since converters use self-generated heat, temperature decline caused by increased scrap volume is inevitable. OTBB technology maximizes secondary combustion and heat transfer efficiency, increasing scrap utilization. At the same time, it uses less carbon-intensive molten iron, thereby contributing to overall carbon reduction.

2. EAF-based Carbon-reduced Steel Production Technology

The EAF process is able to reduce CO_2 emissions by up to 75% compared to the blast furnace by using scrap instead of coal and iron ore, which are the main sources of carbon emissions. Hence, the process serves as a key carbon-reduced production mechanism. To respond to global carbon regulations, such as EU Carbon Border Adjustment Mechanism (CBAM), POSCO began construction of a 2.5 Mtpa EAF plant at Gwangyang Works in 2024. POSCO plans to develop technology that feeds molten steel produced in EAFs directly into the refining process to mass-produce carbon-reduced automotive and electrical steel sheets. The company will continue to actively respond to customer demands for carbon reduction.

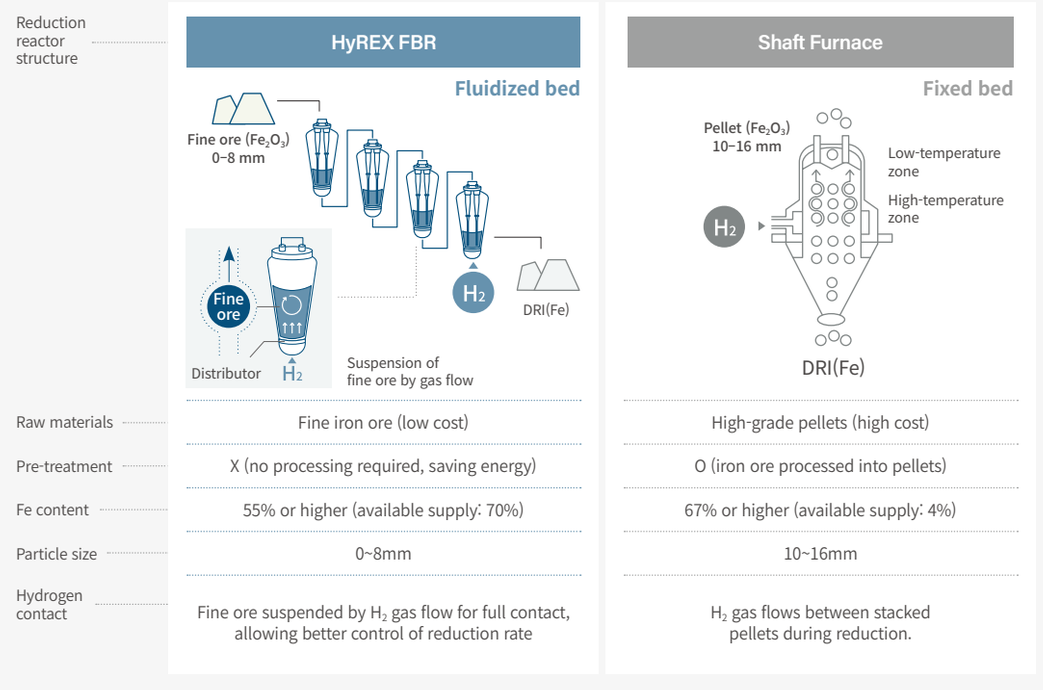
3. CCUS Technology

POSCO group is conducting research on CO_2 capture and resource recycling. POSCO's CO_2 injection technology, which reinjects CO_2 into coke ovens to increase the calorific value of by-product gases, was selected as one of the Ministry of Trade, Industry and Energy (MOTIE) Top 10 R&D Projects in 2024. Mineral carbonation technology using slag is also being developed under a national R&D project. In addition, CCS technologies for permanently sequestering captured CO_2 in depleted oil and gas reservoirs are being evaluated through a feasibility study at Krakatau POSCO (PT KP) in Indonesia.

4. POSCO's Proprietary HyREX Technology

Hydrogen reduction ironmaking is a technology that reduces GHG emissions by using hydrogen as both a reductant and heat source. HyREX is POSCO's proprietary hydrogen reduction ironmaking technology that employs fluidized bed reactors from its commercial-grade FINEX process. HyREX is set apart from the shaft model widely adopted by competition in regard to feedstock and equipment technology. While the shaft furnace is charged with pellets that process iron ore into uniform-sized spherical shape, HyREX can use fine ore that forgoes additional treatment. Hence feedstock is easily sourced and cost-effective. Fluidized bed reactors (FBR) employed in the process comprise the key equipment used by HyREX, adding temperature and reduction rate control benefits compared to the shaft furnace. Since the technology from the FBR-based FINEX process can be utilized for hydrogen reduction and Direct Reduced Iron (DRI) production, HyREX is recognized as one of the most innovative next-generation decarbonized steelmaking technology.

HyREX Technology Comparison



Securing the Raw Material Supply Chain Unlike shaft furnaces that use processed iron ore (pellets), POSCO's HyREX technology adopts the FBR method that directly uses fine ore without additional processing. Currently, high-grade pellets account for only about 4% of the global iron ore supply. Once hydrogen-based steelmaking becomes commercialized, the race among shaft furnace operators to secure raw materials will intensify. In comparison, POSCO can utilize fine ore, which represents approximately 70%[1] of the global iron ore supply, to enhance cost competitiveness and ensure a stable supply of raw materials.

1) Fastmarkets estimates

Development of Core HyREX Technology After installing a 50kg-scale test FBR in 2023, POSCO validated the hydrogen-based fluidized reduction technology. In April 2024, POSCO completed a 1-ton-per-hour Electric Smelting Furnace (ESF) test facility at Pohang Works and successfully tapped molten iron for the first time. Through these achievements, POSCO laid the foundation for developing the core technologies for FBR and the ESF, as well as the broader HyREX technology.

Construction of HyREX Demonstration Facilities and Commercialization POSCO began the permit process in 2021 to develop a 1.35 million m^2 hydrogen reduction ironmaking site at Pohang Works, and received final approval from the Ministry of Land, Infrastructure and Transport in March 2026. In 2022, POSCO signed a joint engineering MoU with Primetals, a company with expertise in FINEX design. The two companies are jointly designing the HyREX demonstration facility. POSCO is participating in the Korean Hydrogen Reduction Ironmaking Demonstration Project, which is a part of the national R&D initiative, with the goal of constructing the HyREX demo plant by 2030. Provided that infrastructure for economical and stable supply of hydrogen and power is secured, the Company plans to pursue phased commercialization by 2050.

Partnership for HyREX Technology Development Since 2023, POSCO has been leading and operating the HyREX R&D Partnership to build a global market consensus on the necessity of HyREX technology. The Partnership now includes 19 companies, including global steelmakers, raw material suppliers, and energy companies. In 2025, the Partnership enhanced information exchange among participating organizations through the sharing of key research outcomes.

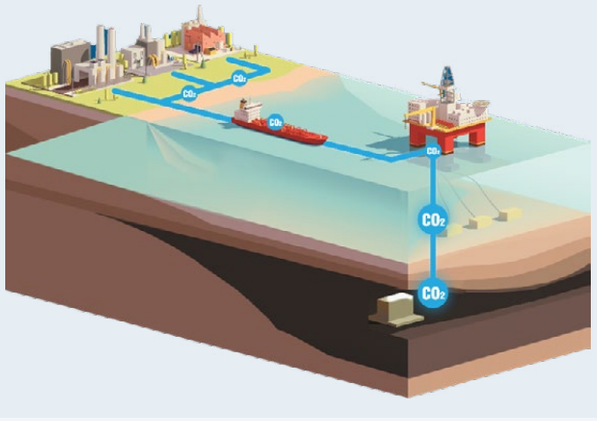
Strategy and Countermeasure

[Infrastructure]

In the infrastructure business, POSCO International is at the center of decarbonization roadmap implementation. In July 2023, the Company announced its 2050 Net Zero roadmap, with a plan to focus on hydrogen co-firing and mono-firing, Carbon Capture and Storage (CCS), and renewable energy projects to reduce emissions. Specifically, the Company's reduction pathways are categorized into direct reduction (Scope 1) and indirect reduction (Scope 2). The former achieves carbon reduction through facility efficiency improvements, fuel transition, and CCS in thermal power generation. POSCO International will consecutively transition its Incheon LNG Combined Cycle Power Plant, one of its key domestic operations, into hydrogen co-firing and mono-firing generation in line with government policies and technology commercialization, In parallel, the Company plans to phase in CCS technology to capture any remaining emissions. To cut indirect emissions, POSCO International plans to secure Renewable Energy Certificates (RECs) through solar, and onshore/offshore wind power, while pursuing renewable energy projects to deliver on group-wide RE100 commitments.

CASE STUDY

In February 2023, POSCO International launched a CCS commercialization task force, leveraging its exploration & production (E&P) capabilities to contribute to carbon reduction efforts at the Group level and to identify new business opportunities. Its key projects in Korea include transportation and storage of CO_2 in the East Sea gas field and assessment of storage potential of the Ulleung Basin. Additionally, the Company is expanding its global CCS portfolio through joint study in Indonesia's Offshore North West Java (ONWJ) block and development of onshore projects in the US. On the R&D front, the Company participates in the offshore plant transition technology development and integrated CCS network optimization projects. Hence, it continues to strengthen its capabilities in designing CO_2 networks between domestic emission sources and overseas storage sites and assessing business feasibility.



CCS(Carbon Capture&Storage) Business Model

[Rechargeable Battery Materials]

In rechargeable battery materials, POSCO Future M is at the focus of designing and implementing decarbonization strategies, as it accounts for the largest share of total emissions in the business. POSCO Future M continues to improve energy efficiency through upgrades to existing facility and processes, while developing GHG reduction technology in collaboration with research institutions. The company plans to roll out solar power generation facility which are currently operational at several sites, such as Gwangyang CAM plant, and to diversify its power procurement portfolio by expanding REC purchases and PPAs.

CASE STUDY

POSCO Future M accelerates its renewable energy transition through collaboration with the Group affiliates. Together with POSCO International, POSCO Future M, installed 2.2 MW-capacity solar panels on the rooftop of the Gwangyang CAM plant. In 2025, 3,126.6 MWh of renewable energy was generated through these panels; a virtuous cycle was created within the Group, allowing REC to be traded with affiliates. Furthermore, 2.5 MW-capacity solar panels are being additionally installed at the Pohang CAM plant. Once completed in November 2026, it is expected to supply 2.8 GWh of renewable energy annually.

Solar panels at POSCO FUTURE M'S Gwangyang CAM plant

Energy Sourcing Strategy in Alignment with the Decarbonization Initiative

In alignment with its decarbonization roadmap, POSCO Holdings' Carbon Neutral Strategy Office annually forecasts changes in the Group's energy mix, which it uses to formulate stable and economical energy sourcing strategies. In light of shifting internal and external conditions, the 2025 strategy focused on developing detailed energy sourcing plans and implementation strategies for each operating company based on the short- to mid-term (2035) roadmap. Through CEO-led strategic discussion meetings and Board meetings, the Group built a consensus on aligning sourcing strategies with the reduction targets of major operating companies (POSCO, POSCO INTERNATIONAL, AND POSCO FUTURE M) as well as on advancing the energy business through group-wide collaboration. As the Group's control tower, POSCO Holdings will continue to contribute to securing a cost-effective energy mix for the Group by providing energy sourcing strategies aligned with the decarbonization roadmap.

Energy sourcing strategy by Business area

Business Sector	Strategy
Steel	To implement the decarbonization roadmap in the steel business, a feasible energy mix optimization is being explored that incorporates improvements in energy efficiency, adoption of low-carbon process technologies, and phased facility transition. In the period leading up to the commercialization of HyREX , bridge energy sources will be applied to compensate for the decline in power generated through byproduct gas. Additionally, the full rollout of decarbonization facilities and relevant infrastructure will require a sizeable supply of hydrogen (as the reductant) and electricity to meet the increase in power demand as they come online. Hence, a cost-effective, carbon-free energy mix will be built and CCS applied to fulfill the decarbonization commitment in Steel.
Rechargeable battery materials	In Rechargeable Battery Materials, improvements to energy utilization structure and adoption of renewable energy continue as a means to address customer needs and to align with the Group's GHG reduction goal. To this end, solar power generation facilities have been installed on the roof of the Gwangyang CAM plant and on the rooftop and parking area of the Sejong Anode Materials Plant to generate renewable energy. Solar power generation will be further rolled out to new plants and other facilities. Renewable energy use will continue to expand through PPAs and other measures.
Infrastructure	In infrastructure, a hydrogen co-firing project is underway at the Incheon LNG Combined Cycle Power Plant, to replace a portion of LNG fuel with domestically produced green hydrogen. CCS will also be applied to reduce carbon emissions.

Other Activities

1. Operation of Internal Carbon Pricing

POSCO has been systematically operating internal carbon pricing since 2024 to manage climate-related business risks and opportunities and to prepare for the transition to a decarbonized business structure. This initiative helps raise employee awareness of climate change and assess the economic feasibility of investments and projects. The pricing is regularly updated to keep pace with shifting market conditions.

2. Response to Emissions Trading Schemes

In preparation for Phase 4 of K-ETS (2026–2030), POSCO group is reviewing plans to introduce reduction technologies and equipment, as well as to develop strategies to reduce its carbon cost burden. POSCO is focusing on mid- to long-term carbon cost management by detailing reduction technologies for the transition to low-carbon processes (e.g., EAFs, HyREX). POSCO International will develop plans to transition from LNG to hydrogen, adopt CCS technology, and optimize emission permit purchases. POSCO Future M is pursuing energy efficiency initiatives such as replacing equipment with high-efficiency alternatives.

3. Response to Mandatory Climate Disclosure

In preparation for mandatory sustainability disclosures in 2028, the Company formed a climate disclosure response task force to build a group-wide response system. While GHG emissions are measured and managed on a consolidated basis, internal carbon pricing is being upgraded to ensure that the carbon costs are effectively reflected in the investment decisions. The Company will also define a standard to identify climate-related capital allocation (CAPEX and OPEX) and develop a framework to analyze financial impacts for multiple scenarios to respond proactively to disclosure requirements.

Just Transition

POSCO group seeks to advance a Just Transition through active stakeholder communication to enable participation in the low-carbon transition. The shift to carbon-reduced processes entails changes in workforce and organization; to minimize risks, the Company is implementing workforce reallocation and reskilling training in time with the rollout of the EAFs and HyREX. The Gwangyang EAF began construction in 2024 and is scheduled to come online in 2026. In preparation, the Company is recruiting production and technical personnel and providing relevant training; at the same time, the scale of workforce transition will be minimized to take full advantage of the fact that HyREX process is based on the existing FINEX technology. The Company is also working to maintain employment stability; reskilling programs are offered to employees working in departments set for downsizing and/or closure, and specialized training systems for new processes are in place, designed in collaboration with POSCO GROUP UNIVERSITY and Technical Research Laboratories. The Company also engages with the local community and has organized joint briefing sessions and public hearings for environmental impact assessments during the development of the hydrogen reduction ironmaking site to share information on environmental and traffic impacts and to gather input from the residents.

Results of Analysis of Risks and Impacts Subject to Scenario Analysis

Physical Risks

POSCO group analyzed physical climate risks by applying S&P Global's climate modeling methodology and the Shared Socioeconomic Pathways (SSPs) adopted in the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6). SSPs are new GHG emission pathways that integrate socioeconomic factors such as future population changes, economic development, and urbanization into the existing Representative Concentration Pathways. In this analysis, the period from 2040 to 2049 was applied. The analysis confirmed varying levels of physical risk exposure and financial impacts across business sites under SSP5-8.5 for the 2040–2049 period. For Temperature Extremes, PT.BIA in Indonesia indicated the highest projected average annual loss rate at approximately 6–10%, with expected financial impacts resulting from asset losses and productivity declines. POSCO Argentina, Pohang Works, Gwangyang Works, Krakatau POSCO, POSCO Yamato Vina, the Incheon LNG Combined-Cycle Power Plant, and the Gwangyang CAM plant showed average loss rates of approximately 1–5%, with rising cooling water temperatures and reduced production efficiency under extreme heat conditions expected to result in additional energy costs and productivity losses at each site. In contrast, the Gwangyang LNG Terminal and Shwe Project in Myanmar were assessed at relatively low levels of less than 1%. Other physical risks, including Pluvial Flooding (Heavy Rainfalls), Coastal Flooding, Fluvial Flooding, Drought, Water Stress, Wildfire, and Tropical Cyclones, were also found to be below 1% across all business sites, indicating relatively low levels of exposure.

Period and Organizational Boundary

The physical risk analysis focuses on the period from 2040 to 2049. According to the IPCC AR6, this is when the physical impacts of climate change, such as increased temperature extremes, extreme rainfall, and sea level rise, are expected to become significantly more visible. The analysis covered a total of ten (10) key business sites, including five (5) in Korea (Pohang Works, Gwangyang Works, Gwangyang LNG Terminal, Incheon LNG Combined Cycle Power Plant, and the Gwangyang CAM plant) and five(5) abroad (Krakatau POSCO, POSCO Yamato Vina, PT.BIA in Indonesia, Shwe Project in Myanmar, and POSCO Argentina).

Financial Impact by Physical Risk (2040–2049, based on SSP5-8.5)[1)]

Modeled Average Annual Loss: Below 1% | 1~5% | 6~10%

Company	Site	Extreme Temperatures	Pluvial Flooding (Heavy Rainfall)	Coastal Flooding	Fluvial Flooding	Drought	Water Stress	Wildfire	Typhoon
POSCO HOLDINGS	POSCO Argentina	1–5%	Less than 1%	Less than 1%	Less than 1%	Less than 1%	Less than 1%	Less than 1%	Less than 1%
POSCO	Pohang Works								
	Gwangyang Works								
	Krakatau POSCO (PT. KP)								
	POSCO Yamato Vina (PY.VINA)								
POSCO INTERNATIONAL	Gwangyang LNG Terminal	Less than 1%							
	Incheon LNG Combined Cycle Power Plant	1–5%							
	Shwe Project in Myanmar	Less than 1%							
	PT.BIA in Indonesia	6–10%	1–5%[2)]						
POSCO FUTURE M	Gwangyang CAM plant	1–5%	Less than 1%						

1) Analysis results in Feb. 2024
2) The risk of Pluvial Flooding (Heavy rainfalls) is 1.1% for PT.BIA

RISK MANAGEMENT

Risk Management

Climate Adaptation and Countermeasures for Physical Risks

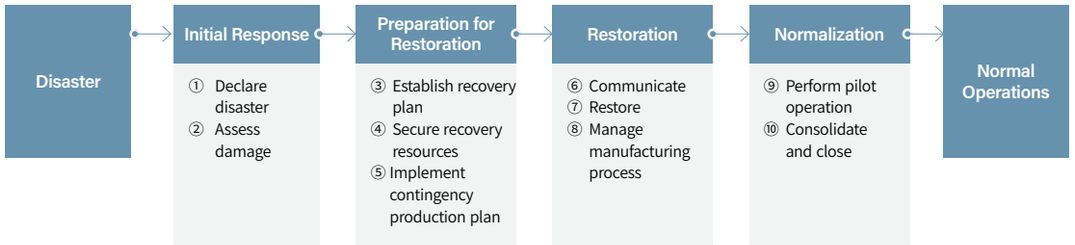
POSCO group considers climate risks from the initial stages of business and investment strategy development and focuses on strengthening climate risk adaptation capabilities across the entire business operations, spanning personnel, infrastructure, and energy. In 2025, the Company implemented physical risk response activities in Pohang Works, Gwangyang Works, the Gwangyang CAM plant, PT.BIA in Indonesia, and POSCO Argentina's lithium facility, among others. Initiatives included reinforcing disaster prevention infrastructure, upgrading cooling and water supply systems, and refining BCPs.

Key Response Activities by Risk Type

Risk Type	Business Site	Key Activities in 2025
Extreme temperature	PT.BIA in Indonesia	· Expanded reservoirs and freshwater storage facilities in preparation for heat waves and droughts, enhanced operation of emergency generators · Updated health manuals and monitoring systems to respond to extreme temperatures · Implemented a real-time monitoring system using in-house meteorological equipment
Fluvial flooding	Pohang Works, Gwangyang Works, Gwangyang CAM plant, PT.BIA in Indonesia	· Operated and enhanced flood and disaster response systems based on Pohang Works' BCP · Advanced disaster prevention infrastructure at Gwangyang Works and CAM plant, including flood barriers, drainage channels, and large-capacity pumps · Maintained drainage channel inspections and emergency restoration systems at palm plantation
Coastal flooding	Pohang Works, Krakatau POSCO (PT. KP), POSCO Yamato Vina (PY Vina), Gwangyang LNG Terminal	· Maintained and reinforced (detached) breakwaters and revetments at Pohang Works · Conducted maintenance of floodgates, water barriers, and drainage facilities at Krakatau POSCO (PT. KP) · Deployed facilities on high ground at POSCO Yamato Vina (PY Vina); regularly performed dredging and drainage at port areas
Drought & water stress	POSCO Argentina lithium facility	· Conducted separate development and utilization of groundwater sources · Continued to save water by 50–80% through the BPED process · Incorporated regional climate characteristics into risk assessments through consultation with external evaluators
Integrated monitoring and investment decision	All operation sites, new investment sites	· Enhanced the physical risk monitoring system for each operation site and conducted regular reassessments · Strengthened climate risk assessment in the new investments and sites

In making new investment, target investment locations and existing operations are assessed for their vulnerability and exposure to climate events from the investment deliberation stage. Measures are then developed to respond to physical risks, such as industrial water shortages from drought, coastal flooding as a result of sea level rise. To ensure business continuity in the event of damage, the business group operates BCPs that spans identification and assessment of damage, recovery planning, resource mobilization, alternative production, status update and communication, recovery work, process management, and closure.

Business Continuity Plan



METRICS & TARGETS

Metrics and Targets

GHG Emissions Management

POSCO group annually manages GHG emissions as a key metric to assess each operating company's effectiveness in climate change response. Relevant performance is monitored regularly and reported quarterly through the group-wide executive consultative body. GHG emissions in 2025 decreased by 3.0% YoY.

Business	Unit	2023	2024	2025
Steel	10,000 tCO_2e	7,209	7,119	6,997
Infrastructure		452	516	410
Rechargeable battery materials		239	230	220

Safety·Health

GOVERNANCE*

Organizational Structure

Group Safety Council

POSCO group regularly holds Group CSO Council meetings attended by Chief Safety Officers (CSOs) and heads of safety departments from 33 affiliates to enhance implementation of its group-wide safety management system. A close collaboration system is also in place through the activities of safety councils at the business sector-level, in steel, infrastructure, and rechargeable battery materials. Through this framework, the Company ensures consistency in its safety strategies, promotes information sharing and benchmarking among affiliates, and proactively manages safety risks across the business group. The Company also focuses its capabilities on fostering a field-oriented safety culture to accident-proof all operation sites.

In September 2025, POSCO Safety Solution was launched to provide safety expertise, with the mission to enhance accident prevention systems and establish the Group's own occupational safety solutions model. POSCO Safety Solution will contribute to elevating the Group's overall safety management capabilities through objective assessments of safety performance and tailored support for each operation site.

POSCO group Safety Council Composition

Chief Safety Officers (CSOs) at operating companies

Group CSO Regular Council (33 companies)

Chief Safety Officers (CSOs) at operating companies + Working-level staff at safety departments

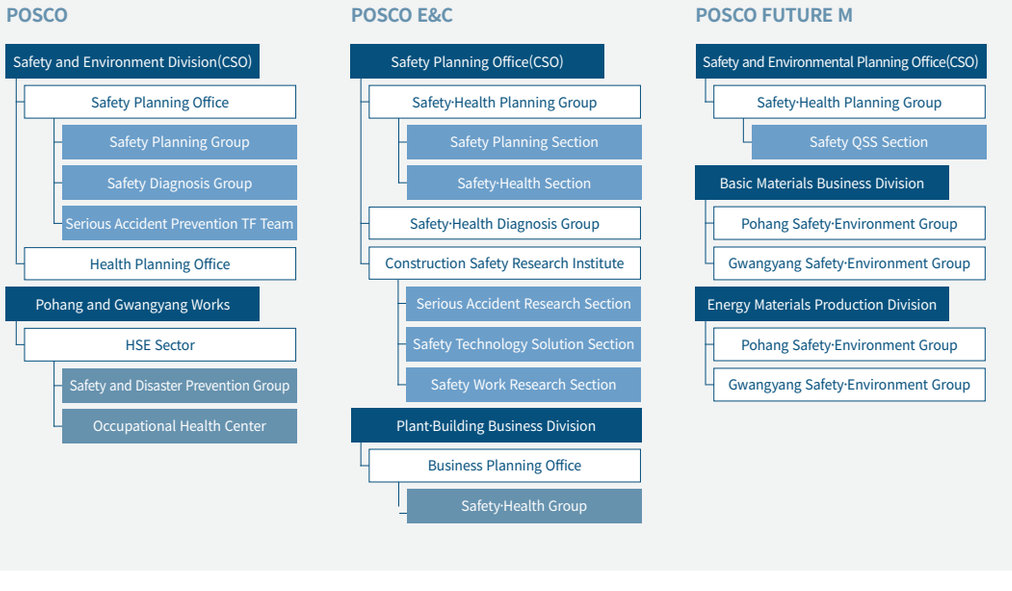
Group Safety Councils by Business Sector

Steel (27 companies)	Infrastructure (8 companies)	Rechargeable Battery Materials (6 companies)
POSCO, POSCO STEELEON, SNNC, POSCO M-TECH, eNtoB, POSCO HUMANS, PNR, POSCO FLOW, POSCO Mobility Solution, 6 maintenance companies, 12 overseas subsidiaries	POSCO E&C, POSCO INTERNATIONAL, POSCO DX, POSCO WIDE, POSCO A&C, SAMCHEOK BLUE POWER, ECO ENERGY SOLUTION, Busan E&E	POSCO FUTURE M, POSCO MC MATERIALS, POSCO-Pilbara LITHIUM SOLUTION, POSCO-HY Clean Metal, POSCO LITHIUM SOLUTION, POSCO SILICON SOLUTION

Dedicated Safety and Health Organization

POSCO group has put in place safety and health management systems tailored to the characteristics and scale of each operating company. POSCO, POSCO International, POSCO E&C, POSCO DX, POSCO Future M, and POSCO Flow have appointed Chief Safety Officers (CSOs) and operate company-wide safety and health organizations at the division and office levels. At individual business sites, dedicated groups and teams under the leadership of executives take charge of site-centered safety management. For operating companies with a single business site or smaller-scale operations, safety and health matters are managed in a systematic manner through Safety and Environment Centers that report directly to the CEO. In particular, POSCO E&C reorganized its safety and health structure to fully overhaul its management system, with the aim of preventing construction accidents at the source. The Company established the Construction Safety Research Institute to strengthen research- and analysis-based proactive accident prevention. The company also raised the role and authority of safety organizations under each business division so that division-specific Action Plans aligned with the Company-wide safety strategy can be put into practice.

Safety and Health Dedicated Organization Structure at Major Operating Companies



* For information on the highest decision-making body related to the Safety·Health topic, please refer to "ESG Governance Framework > Board and ESG Committees".

GOVERNANCE

Control and Procedures

Policy and Guidelines

POSCO group defined its occupational safety and health policy to ensure the physical and mental well-being of our workers and to foster a safe working environment. This policy encompasses company-wide safety and health principles and action plans, including hazard and risk management, product and service safety, and employee health. This policy applies to POSCO group and partner companies are also encouraged to comply. In 2024, the Company revised the Supplier Code of Conduct Guidelines to further specify details related to supply chain safety, thereby strengthening its safety management system.

Embedding Safety into Performance Evaluation

To make safety a core management value in practice, POSCO group began implementing a reinforced safety KPI framework for management performance evaluations in September 2025. Under the revised framework, the safety evaluation weighting was raised from the previous 1.5–3.8 points to 10 points across the board, putting safety on an equal footing with other management performance indicators. The Group also brought the safety management diagnostic results of POSCO Safety Solution, a specialized safety company, directly into its performance evaluations. This marks a shift away from a results-oriented approach that looked mainly at whether accidents had occurred. The new framework places greater weight on the process itself, assessing safety activities more comprehensively from planning through execution. POSCO operates a range of safety recognition programs. POSCO E&C, for example, provides quarterly incentives when the Company records zero serious accidents across its operations, helping sharpen accountability for safety management and further anchor the systems needed to create safer workplaces.

STRATEGY

Risk and Opportunity

Identification of Safety·Health Risks

Across its steel, infrastructure and rechargeable battery and other business, POSCO group closely monitors changes in the safety and health regulatory environment, such as the Occupational Safety and Health Act and the Serious Accidents Punishment Act. The operating environment varies by business, such as manufacturing, construction, power generation, IT; therefore, precise safety management is needed, tailored to the risk factors unique to each process, spanning utilization of heavy machinery, operation of high-temperature/high-pressure facility, and handling of chemicals. Additionally, management initiatives must be in place to prevent occupational diseases caused by exposure to hazardous substances and to improve employee mental health. In particular, the Serious Accidents Punishment Act has expanded the scope of safety and health management in the supply chain to include employees of suppliers, subcontractors, outsourcing companies, and commissioning service providers.

STRATEGY

Strategies and Countermeasures

Safe Workplace Strategy

Reflecting recent shifts in the industrial safety paradigm, POSCO group has revised its group-wide safety and health strategy. The overall on-site management system was re-evaluated through labor-management joint reviews and comprehensive assessments with external experts. Based on these efforts, the Company set the vision of “creating a safe workplace together, through joint efforts of labor and management.” Under this vision, POSCO group has clearly defined the direction to improve its safety management system. Today, the Group is implementing an integrated strategy to maximize the business group’s overall safety capabilities.

Employees are encouraged to take charge in preventing accidents. At the same time, to solidify the foundation of group-wide safety management, the Group conducts comprehensive inspections of subcontracting processes across all operation sites and takes measures to eliminate ‘risk outsourcing.’ The Group is embedding safety as the core management value and comprehensively advancing safety infrastructure, organizations, and investment framework. The principle of “take action first, report later” for safety budgets has been broadly applied to ensure the timely implementation of on-site safety measures. Accident prevention initiatives are also being implemented in stages, such as stricter monitoring of high-risk operations, hands-on training, and the adoption of smart technologies. Systematic certification, training, and evaluation programs are in place to enhance the safety capabilities of suppliers. In addition, the Company establishes a foundation to support industrial accident victims and bereaved families, linking these efforts with a broader group-level strategy for building a social safety net. Aligned with these strategic execution capabilities, the Company is committed to maximizing its ability to prevent serious accidents and advancing its safety management system.

POSCO group Safety Strategy Framework

Core Value
Safety is the foundation of a vibrant workplace.
Vision
Creating a safe workplace together, through joint efforts of labor and management
Strategy
01
Encourage Worker Participation
From passive workers to active safety leaders
① Guarantee of workers’ rights
- Right to know; right to participate; right to refuse unsafe work
② Operation of safety systems centered on workers
③ Implementation of prevention activities
02
Update Safety Systems
Systematic enforcement of “Safety-first”
① Upgraded safety-first organizations and evaluation systems
② Increase in the safety budget and advancement of facility management
③ Introduction of “third-party assessments”
④ Playing a key role in building an industrial safety ecosystem
03
Improve On-site Operability
Effective prevention based on communication and trust
① Enhancement of employee safety capabilities for both POSCO and suppliers
② Support for vulnerable groups (e.g., foreign workers, older workers)
③ Efficiency improvement of prevention activities using Industry 4.0 technologies

Advancement of On-site Safety Management with AI and Smart Technologies

POSCO group endeavors to eliminate safety blind spots in workplaces and ensure worker safety by incorporating cutting-edge technologies, such as AI and the Internet of Things (IoT). The smart inspection and monitoring systems detect hazards and risks at worksites in real time. Specifically, the focus is on fundamentally eliminating accident risks by deploying robots for high-risk tasks.

[Steel]

POSCO uses AI-powered real-time detection and automatic control systems, based on smart safety technology that was developed in-house. These systems are applied to high-risk tasks at the steelworks, such as work involving confined spaces, heavy machinery operation, and high-elevation work.

Key Applied Technologies

Technology	Description
AI-based work risk prediction model	· Provides guidance on work risk levels (S/A/B) by learning work types, work details, and past risk assessment results · Improves the consistency of on-site work risk assessment and the efficiency of safety management resource allocation in connection with D-Safety Meetings
Smart Wire Ball	· Converts raw material transfer conveyor inspections from manual checks to smart inspections based on Smart Wire Balls · Checks abnormalities in real time through AI-based acoustic, thermal imaging, and video analysis, and is currently being piloted at Pohang and Gwangyang Works
Noise meter and smart hearing protection	· Develops smart earplugs applying IoT-based noise measurement technology and promotes phased introduction at worksites · Supports noise exposure reduction and communication among workers through situational noise cancellation and short- and long-distance communication functions

[Rechargeable Battery Materials]

POSCO Future M achieved digital transformation in its access control and safety monitoring systems at rechargeable battery material manufacturing sites. The company also adopted an AI-based alarm system to strengthen worker safety.

Key Applied Technologies

Technology	Description
Smart ILS and safety control systems	· The smart isolation locking system (ILS) provides stricter access control at hazardous facilities and zones, while managing the entire process of work permits, locking, and unlocking · Monitors workplace safety in real time and immediately releases alerts when abnormal signs are detected
Forklift automatic stop system	· Uses AI object-recognition cameras to control forklift speed when a worker is detected in its path · Helps prevent serious accidents by proactively blocking collisions between forklifts and workers on manufacturing lines

[Infrastructure]

POSCO E&C actively implements cutting-edge technologies at construction sites to address major risk factors, such as falls, collisions, and collapses. These technologies include AI surveillance cameras, autonomous walking robots, and drones. In particular, POSCO E&C endeavors to eliminate the fundamental causes of on-site accident risks with an unmanned operation strategy that substitutes robots and drones for high-risk tasks that were previously performed by human workers.

Key Applied Technologies

Technology	Description
AI surveillance cameras for safety system monitoring	· Monitor the arbitrary removal of safety installations in real time · Detect hazardous areas such as guardrails, safety nets, and openings · Automatically detect unauthorized removal, incorrect installation, and non-installation of safety systems
AI surveillance cameras in front of forklifts	· Cameras mounted in full-motion brackets (in-house developed) provide operators with forward visibility · Fundamentally block collision risks between workers and equipment in material transport zones at construction sites
Robots for creating concrete interface roughness	· A semi-autonomous driving robot automatically creates rough surfaces at concrete segmented pouring interfaces, minimizing workers' exposure to danger compared to conventional manual work
Walking robots for hazardous area inspections	· Autonomous walking robots mounted with high-performance cameras, light detection and ranging (LiDAR), and toxic gas detectors perform unmanned patrols and inspections in hazardous areas · Conduct safety monitoring in confined spaces and elevated areas to eliminate human risk
Drones for AI crack management	· Precision drones automatically detect crack width and length through AI image analysis of high-altitude areas · Ensure accuracy and safety compared to visual inspections by analyzing crack occurrence volume and automatically identifying excessive-risk zones

Instilling a Group Safety Culture through Joint Labor-Management Efforts

POSCO group strives to instill a distinctive safety culture and spread it to all of its affiliates based on joint labor-management efforts. The Group Safety Special Diagnostic TF Team was launched in August 2025 and formulated comprehensive disaster prevention measures through close consultation with the POSCO group Labor Union Alliance. Moreover, the communication channels, including regular working-level meetings, were maintained after formulating the measures through which labor and management jointly review implementation progress on a periodic basis. The Group also establishes a comprehensive safety communication system covering not only employees but also contractors, thereby substantively reflecting the opinions of all stakeholders in its safety and health policies. POSCO actively incorporates the Voice of the Employee into its policies through quarterly Occupational Safety and Health Committee meetings and monthly joint labor-management committees. Centered on this multi-layered communication model, the Company will remain dedicated to disseminating a safety culture across the entire group and achieve the shared goal of accident prevention.

Operation of Safety and Health Systems

POSCO group maintains ISO 45001 and KOSHA-MS certification at major operation sites, through which safety and health management systems are regularly inspected and evaluated. According to internal policies, management targets are defined as production facilities or construction sites with 500 or more regular workers that are mandated to operate dedicated safety and health organizations under the Serious Accidents Punishment Act. Based on this framework, the Group systematically monitors and manages safety and health performance.

Safety and Health Management System at POSCO Group

Company	Certification	Business Site
POSCO	ISO 45001	Pohang Works, Gwangyang Works
POSCOINTERNATIONAL	ISO 45001	Major domestic and overseas business sites (10 locations)
POSCO E&C	ISO 45001	Headquarters and all business sites
POSCO FUTURE M	ISO 45001	Headquarters and all business sites, including Pohang and Gwangyang Works
POSCO DX	ISO 45001	Pohang Headquarters, Gwangyang Office, Pangyo Office
POSCO STEELEON	KOSHA-MS	Headquarters, Color and Processing Plant
POSCO M-TECH	ISO45001/KOSHA-MS	Pohang Headquarters, Gwangyang Packaging Business Division, Ferromanganese Production Division, Aluminum Plant

Safety and Health Audits

In an effort to objectively assess safety and health risks and identify effective measures for improvement, POSCO group conducts external safety inspections with globally prominent safety consulting firms. In 2025, the Group signed MoUs with dss+, an independent company spun off from DuPont's safety consulting division, and SGS, the world's largest inspection, testing, and certification company. Accordingly, the Group's major operating companies received safety consulting services. dss+ conducted assessments for POSCO based on its diagnostic expertise in process safety and safety culture. SGS, on the other hand, leveraged its network of leading global companies to assess POSCO E&C.

Status of Audits by Safety Consulting Firms

Classification	dss+	SGS
Period	Oct. 27–Dec. 19, 2025 (total 8 weeks)	Oct. 27–Nov. 26, 2025 (total 5 weeks)
Target	POSCO headquarters, 4 plants within Pohang and Gwangyang Works (steelmaking, oxygen, chemical, hot rolling plants)	POSCO E&C headquarters, 6 projects (2 projects each for plant, infrastructure, and construction)
Assessment Items	Process Safety Management (PSM) systems, on-site inspections (risk-based inspections by process)	Safety and health management systems, evaluation systems, education and training

Safety and Health Risk Assessment and Mitigation Measures

To manage safety proactively, POSCO Group identifies workplace hazards and risks in advance and implements improvement actions based on risk assessment results. By analyzing accident types and hazard/risk factors by plant, the Group regularly reviews and shares high-risk management status, while tracking performance at the Company, worksite, and plant levels to drive continuous improvement. At worksites, high-risk tasks are checked before work through standardized safety procedures, including Toolbox Meetings (TBMs), and smart technologies such as AI and IoT are used to diagnose workplace risks and replace or reduce high-risk manual tasks.

Worker Safety and Health Training

POSCO group provides systematic safety and health training for all workers to strengthen safety management capabilities across its directly operated workplaces and affiliates. Through the POSCO group Safety Academy, the Group integrates training programs for Group companies and partners, while extending support to local SMEs to enhance safety capabilities across the broader industrial ecosystem. Its programs are organized by type, including job- and site-oriented safety laws and other training, national safety certification support, and legally required mandatory safety training. For onsite supervisor candidates, the Group provides case-based in-depth training and links the outcomes to its personnel system, systematically developing leadership resources responsible for workplace safety.

Safety Training Programs at POSCO group

Course	Target	No. of Trainees Completed*
Safety laws and other training	Employees of relevant departments related to safety duties among all employees (incl. contract workers)	17,472
Support training for safety certification acquisition	Employees wishing to improve their safety capabilities among all employees (incl. contract workers)	667
Mandatory safety training	Mandatory for all employees (incl. contract workers)	35,414

* Including duplicates

Handling of Hazardous Substances and Protection of Handlers

POSCO group reviews chemical risk management across its subsidiaries in accordance with its chemical handling principles. POSCO conducts prior reviews of the impacts of chemical transportation, use, and disposal at each steelworks. Pursuant to the Act on Registration and Evaluation of Chemical Substances, the Company monitors the registration and management of handled chemicals, verifies compliance with safety standards at chemical handling facilities, and conducts emergency drills to prevent accidents. POSCO Future M regularly assesses the likelihood and impact of chemical risks at each operation site and establishes corrective actions and management plans accordingly. POSCO and POSCO Future M also manage chemical substance information at each worksite, provide material safety data sheets (MSDS), designate managers for hazardous chemicals, and conduct emergency drills to help handlers understand hazards and work safely.

Emergency Response and Accident Prevention Activities

POSCO group establishes and operates emergency response plans for major industrial accidents, disasters, fires, explosions, chemical accidents, and other emergencies. Through risk assessments, the Group identifies and manages potential emergency-related risks in advance, while maintaining emergency contact systems that enable employees and stakeholders to report incidents immediately. The Group also operates external communication channels with local governments and relevant organizations and conducts scenario-based drills to regularly test and strengthen response effectiveness.

POSCO conducts drills for four major emergency types — firefighting, PSM, confined spaces, and chemical accidents — at the plant and section levels, and maintains a “Rapid Response Guideline for Serious Accidents” and a dedicated rapid response task force to enable immediate action. POSCO International operates emergency action plans covering fires, explosions, hazardous substance leaks, emergency contact networks, evacuation routes, roles and responsibilities, and cooperation with external organizations. POSCO International also uses a safety platform to enhance emergency response capabilities and safety management efficiency. POSCO Future M operates emergency response systems to minimize casualties and property damage. After initial response, POSCO Future M investigates incidents, analyzes causes, and establishes and implements recurrence prevention measures to strengthen accident prevention. POSCO E&C immediately assesses site conditions after an accident and operates a reporting system through phone calls and SNS within one hour. For serious accidents, POSCO E&C forms a dedicated investigation team to conduct initial response and identify causes in parallel. After reporting the accident, POSCO E&C suspends work, takes necessary response measures, and continues to improve its response system through headquarters-led investigations and follow-up analysis.

Operation of Worker Safety and Health Support Programs

POSCO group ensures that its employees receive general and special health checkups and mental health programs to support workers’ health. POSCO provides special health checkups at least once a year for workers exposed to hazardous substances, particularly at steelworks sites. Jobs are reassigned when occupational diseases are suspected. In addition, at outdoor, field-oriented worksites, POSCO restricts work during heat waves. Air-conditioned rest facilities are provided along with electrolyte drinks during summer heat. Beyond physical safety, POSCO group also supports employees’ mental health and emotional well-being through psychological counseling and mental health programs via in-house counseling centers and external partnerships.

Key Programs

- Employee health checkups, support for comprehensive medical checkups in collaboration with advanced general hospitals, health checkups for spouses
- Special health checkups for workers exposed to hazards, job reassignment when occupational diseases are suspected
- Establishment of health management infrastructure (e.g., managing employee health checkups, health administration offices, work-related diseases, hazardous chemical, work environment measurement, and musculoskeletal disorder)
- In-house counseling centers providing one-on-one counseling sessions, job stress surveys, mental health examinations, visiting counseling services

* Some programs may vary by operating company.

[Steel]

POSCO operates the in-house psychological counseling center “Mindfulness Center” staffed by professional counselors. Services include one-on-one in-person counseling, psychological and brainwave assessments for personalized therapies. The counselors also visit departments to provide education on such topics as organizational communication using MBTI, conflict management using the Thomas-Kilmann Conflict Mode Instrument (TKI) and stress management techniques. Confidentiality is strictly maintained, and external counseling services are arranged when necessary to provide a supportive environment. In 2025, the Company conducted a total of 4,500 one-on-one in-person counseling sessions, including 3,736 sessions for its employees, 369 sessions for family members of employees, and 395 sessions for partner companies. Since 2024, POSCO has also introduced gatekeeper training course for supervisors, along with training to foster a culture that prioritizes respect for life, raising awareness of the critical importance of mental health.

In-person Counseling Provided by the Mindfulness Center

Classification	2023	2024	2025	Cumulative
Company employees	2,528	2,521	3,736	8,785
Family members of employees	636	773	369	1,778
Partner companies	149	347	395	891
Total	3,313	3,641	4,500	11,454

[Infrastructure]

POSCO E&C operates various health management programs to protect the safety and health of construction site workers and employees. In 2025, POSCO E&C prioritized medical services for vulnerable workers, including older and foreign workers, and improved working conditions through catering and emotional care services for site workers. During extreme summer heat, POSCO E&C provided cooling vests and mobile cooling shelters, and expanded rest infrastructure by supporting partner companies with Eco&Rest, a mobile solar-powered worker rest shelter. To promote mental health, POSCO E&C operates the “With Hyu Psychological Counseling Program,” offering customized support through internal, external, and remote counseling channels. Professional counselors provide counseling and therapeutic support for work-related stress, interpersonal relationships, and personal concerns, helping create a healthier working environment for workers exposed to high-stress construction sites. In 2025, 374 employees participated in the program, receiving support for mental health management and work-related stress relief.

Key Worker Health Management Programs

Worker Health Protection	Site Environment Improvement	Rest and Psychological Care
· Provide priority medical services for vulnerable workers, including older and foreign workers · Operate on-site catering and emotional care services for site workers	· Support workers with cooling vests during extreme summer heat(1,030 vests across 103 sites) · Operate on-site catering and mobile cooling shelters	· Provide Eco & Rest mobile solar-powered worker rest shelters (11 units provided; 43 units cumulative) · Operate the With psychological counseling support program(8 sessions per person)

RISK MANAGEMENT

Risk Management

Safety Risk Management Process

As part of its initiatives to prevent serious accidents, POSCO group carries out intensive prevention activities across all affiliates in order to ensure effective operation of safety management systems on-site. Since December 2025, with the goal of eradicating serious accidents, the Group has implemented the “Two-Track Serious Accident Prevention Activities.” These activities are centered on two pillars: (i) elimination of unauthorized work and access in hazardous zones; and (ii) enhancement of major risk factor management systems.

Elimination of Unauthorized Work and Access in Hazardous Zones

To fundamentally block exposure to risks caused by insufficient awareness of hazards and omission of safety measures, the Group strictly prohibits unplanned work in unauthorized facilities and locations. In line with such efforts, the Company has a plan -do -check -action (PDCA) management system in place.

PDCA Management System at POSCO Group

Stage	Plan	Do	Check & Action
Responsible party	Work order issuer	Work performer	Work supervisor
Key activities	Advance control of work scope and risk factors · Labeling target equipment and setting work zones · Clarifying work targets and scope · Guiding worker routes · Eliminating hazard and risks in advance · Restricting access when necessary	Recognizing risks and implementing safety measures before work · Checking risks within equipment areas and movement routes before work · Assessing safety measures · Confirming that all workers are aware of key hazards and risks during TBMs	Ensuring implementation on-site and improving insufficient items · Inspecting work status and supplementing deficiencies · Verifying implementation of on-site safety measures (e.g., ILS during operation) · Assigning safety guardians to vulnerable work groups (e.g., daily hires) · Providing education to suppliers on eliminating unauthorized work and guidance for worker communication

Enhancement of Major Risk Factor Management Systems

POSCO group operates a step-by-step safety management system that addresses major risk factors based on serious accident cases. In Stage 1 (identify risk), major risk factors, such as high-risk work, equipment, substances, and vulnerable groups, are redefined and systematically identified for each plant and workplace. In Stage 2 (enhance standards), safety measures and standards for the identified hazards are improved, while the subject and instructions for the work are clarified so that key safety measures are reflected in standards. Lastly, in Stage 3 (educate and assess), safety standards education and information are provided to the workers, and the implementation status --including ILS --is continuously assessed to enhance on-site safety execution capabilities.

METRICS AND TARGET

Metrics

Group Safety Indicators[1)]

POSCO group set Lost Time Injury Frequency Rate (LTIFR) and Total Recordable Injury Frequency Rate (TRIFR) as key safety indicators. The Group annually assesses and manages status across the entire business group, which includes employees and partner companies.

Classification	Unit	2023	2024	2025
Occupational safety and health management system (ISO 45001/KOSHA-MS) certification rate[2)]	%	100	100	100
LTIFR	persons per 1 million hours	0.56	0.73	0.80
- Employees		0.27	0.64	0.74
- Contractors[3)]		0.72	0.77	0.83
TRIFR	persons per 1 million hours	1.74	1.99	1.95
- Employees		1.35	1.42	1.67
- Contractors[3)]		1.95	2.31	2.10

1) POSCO HOLDINGS, POSCO, POSCO INTERNATIONAL, POSCO E&C, POSCO FUTURE M, POSCO DX, POSCO FLOW, POSCO STEELEON, POSCO Mobility Solution, POSCO M-TECH
2) Internally defined as business sites required to establish a dedicated organization to prevent serious accidents (sites with 500 or more regular employees).
3) To prevent double counting, employees of Group companies are excluded from contractor employees

Targets

Group Safety Targets

POSCO group sets Lost Time Injury Frequency Rate (LTIFR) targets for each operating company as a key management indicator to build safe workplaces.

Operating Company	Unit	2025 Performance	2026 Target
POSCO	persons per 1 million hours	0.79	0.59
POSCO INTERNATIONAL		0.17	0.17
POSCO E&C		0.69	0.64
POSCO FUTURE M		0.64	0.61

Executive Safety KPIs

POSCO group reflects quantitative safety indicators in executive KPIs.

POSCO
- Representative Director and CEO: 25% of KPI (number of serious accident victims at domestic business sites)
- Head of Works: 25% of KPI (number of serious accident victims at each Works)

POSCO E&C
- Head of Management Planning Division and Head of Management Innovation Division: 25% of KPI (serious accidents, LTIFR)
- Head of Plant Business Division and Head of Building Business Division: 25% of KPI (serious accidents, LTIFR)

Ethics·Compliance

GOVERNANCE

Organizational Structure

Board of Directors

The Board of Directors of POSCO Holdings is the highest-level body overseeing ethics and compliance management. Under the Board, the Audit Committee and the ESG Committee manage and oversee corporate ethics and internal transactions in a structured manner. The Board also receives regular reports from the Compliance Officer on reviews of compliance with the Compliance Control Standards, enabling close oversight of the Group's ethics and legal risks. In December 2025, the Board received reports on review results in key compliance areas, including bribery, unfair trade practices, trade secrets, and personal information, as well as the assessment of the effectiveness of the compliance control system. In particular, Operating Rules For the Board of Directors explicitly require the ESG Committee to review internal transactions on an ongoing basis and the results of compliance control reviews to be reported to the Board annually, reinforcing the supervisory function within the governance framework.

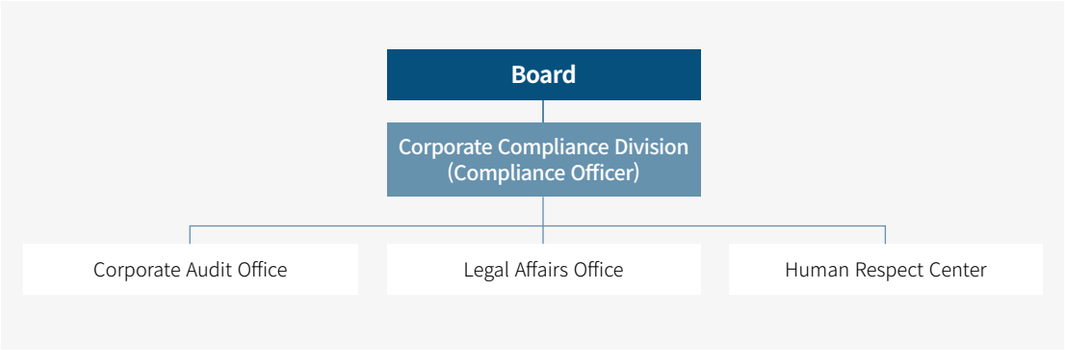
Audit Committee

The Audit Committee is established and operated in accordance with applicable laws and regulations, including Article 542-11 of the Commercial Act, and independently oversees the Company's business operations and accounting. The Committee receives regular reports on internal audit results, helping reinforce transparency and accountability in management.

ESG Committee

The ESG Committee oversees compliance and the Compliance Program (CP), and receives reports at least semiannually on the operation of the fair trade CP and compliance risk management activities.

Ethics·Compliance Organization Chart



Corporate Compliance Division

The Corporate Compliance Division of POSCO Holdings oversees the group's compliance functions across legal affairs, ethics, audits, anti-corruption, fair trade, and intellectual property management. The Head of the Corporate Compliance Division, an attorney-at-law and Senior Executive Vice President, has been appointed by the Board as POSCO Holdings' Compliance Officer.

The division is staffed by 44 professionals, including ISO 37301 lead auditors, attorneys admitted in Korea and overseas, patent attorneys, certified public accountants, and certified labor consultants. The Corporate Audit Office under the Corporate Compliance Division supports the Audit Committee in carrying out its audit duties. It is also responsible for developing and operating the group's audit strategy and overseeing the internal audit departments of each operating company.

POSCO Group Ethical Management Council

The POSCO group Ethical Management Council consists of executives from the Corporate Audit Office under the Corporate Compliance Division of POSCO Holdings, the heads of Corporate Audit Office at 24 operating companies, the head of the Corporate Audit Office, the heads of corporate audit groups, and the head of the Human Respect Center. The Council serves as a platform for sharing the status of group-wide risk management in areas such as ethics, safety, and the environment, and discussing improvement measures. Twice a year, material matters are included in the internal audit department's work reports and reported to the Audit Committee of POSCO Holdings, which is composed entirely of outside directors.

POSCO Group Legal Affairs Council

POSCO Holdings operates the POSCO group Legal Affairs Council, attended by the Compliance Officers of POSCO Holdings and major operating companies. The Council meets quarterly to discuss compliance controls and key group-level legal issues. The Council also provides specialized legal training to strengthen the group's compliance capabilities and supports the sharing of practical know-how among operating companies.

POSCO Group Compliance Manager Council

POSCO Holdings operates the POSCO group Compliance Manager Council (or Group Compliance Manager CP Meeting) once a year, bringing together compliance managers from POSCO Holdings and major operating companies to share the group's fair trade policy direction and discuss ways to advance CP operations. Compliance managers at POSCO Holdings and major operating companies work together through the Group CP Support Task Force to support the adoption and operation of CPs by group companies and suppliers. They also conduct joint fair trade inspections and compliance briefings for management.

Controls and Procedures

Ethics Policies and Guidelines

POSCO Holdings' Ethical Management standards and policies comprise 11 documents in total - two company regulations and nine business guidelines - including the Code of Ethics applicable to all employees, including contract workers, the Audit Committee Operating Regulations, and the Internal Audit Guidelines. The Corporate Audit Office under the Corporate Compliance Division and the Human Respect Center regularly review the adequacy of these regulations and guidelines and oversee related activities. As part of its effort to put in place a new Code of Ethics framework, POSCO Holdings revised its Code of Ethics and separately refined the practice guidelines, providing more specific guidance for situations requiring ethical judgment.

Ethical Management Regulations and Guidelines

Company Regulations

- Code of Ethics
- Operational Regulations of the Audit Committee

Work Guidelines

- Code of Ethics Practice Guidelines
- Internal Audit Guidelines
- Anti-Corruption Guidelines
- Guidelines on Compensation and Immunity for Reporting Ethical Misconduct
- Guidelines on Preventing Conflicts of Interest
- Guidelines on Preventing Workplace Bullying
- Guidelines on Preventing Sexual Harassment in the Workplace
- Special Terms and Conditions for Ethical Practice
- Special Terms and Conditions for Ethical Practice for Overseas Business

[Anti-Corruption Compliance Guidelines]

The Anti-Corruption Compliance Guidelines were partially revised to incorporate anti-corruption compliance management measures. Under the Guidelines, "corruption" refers to any misconduct through which tangible or intangible benefits - such as assets, status, or opportunities - are obtained by illegal or improper means in connection with business activities, or through which a third party is enabled to obtain such benefits.

Compliance Policy

- POSCO Holdings and seven operating companies[1] that have appointed Compliance Officers manage the Compliance Control Standards[2] as company regulations.
- POSCO Holdings and 34 operating companies[3] that operate CPs manage the Compliance Program Operational Guidelines as company regulations
- Requirement to appoint compliance program managers and report the status of CP operations to the ESG Committee (semiannually)

1) POSCO, POSCO INTERNATIONAL, POSCO E&C, POSCO FUTURE M, POSCO DX, POSCO FLOW, AND POSCO STEELEON
2) Includes compliance support across company operations, assessment and management of legal risks, and compliance reviews (with compliance support activities reported to the Board once a year)
3) 34 Group companies, including POSCO, POSCO INTERNATIONAL, POSCO E&C, AND POSCO FUTURE M

Grievance Channels and Whistleblower Protection

Grievance Channels

POSCO group operates the Grievance Channels around the clock to receive reports of unethical conduct by employees. Any stakeholder may seek consultation or file a report on work-related unethical conduct, abuse of authority, workplace bullying, sexual harassment, or other concerns. The reporting center is operated by the internal audit department of each operating company, which manages the full process from receipt and investigation to follow-up. In principle, all reports are investigated.

Grievance Channels

Online Reporting Center

Phone
080-390-3366
02-3457-0202

Mail
(Corporate Audit Office, Corporate Compliance Division, POSCO HOLDINGS, 440 Teheran-ro, Gangnam-gu, Seoul, 06194, Republic of Korea

Whistleblower Mechanism

Through its whistleblowing mechanism, POSCO group reinforces Ethical Management and allows all employees to access the Ethical Misconduct Reporting Center around the clock. Since 2024, POSCO group has used monthly application pop-up surveys through its internal system and ethics dilemma case training to encourage reporting.

Whistleblowing Process

Submit a report (or request consultation)	Investigate facts	Verify facts and request action	Follow-up management	Notify results
Via the Ethical Misconduct Reporting Center website (available 24/7), email, phone, mail, or in person	Interview relevant parties (reporter, respondent, third party)	Complete investigation (request HR action if necessary)	Recurrence-prevention training and monitoring	Notify parties of investigation results

Whistleblower Protection

POSCO group prohibits any action that may expose a whistleblower's identity during the consultation or reporting process. It operates relevant systems so that violations may be subject to disciplinary action in accordance with applicable guidelines. At the beginning of each year, employees of internal audit departments sign the Auditor Confidentiality Pledge, committing to protecting whistleblowers' identities. Procedures for preserving confidentiality, including the protection of whistleblower information, are set out in the Guidelines on Compensation and Immunity for Reporting Ethical Misconduct, based on provisions of Article 3 of the Public Interest Whistleblower Protection Act applicable to private companies. Through these safeguards, POSCO group protects both employee whistleblowers and external stakeholder reporters.

STRATEGY

Strategies and Response Measures

Employee Ethics Practice Programs

To deepen employees' understanding of ethics and put ethical conduct into practice, POSCO group collects ethics pledges from employees at all global business sites each year, while also carrying out regular training and campaigns.

· Ethics Pledge: Electronic pledges for all employees in Korea and overseas, including contract workers (every January)
· Ethics Training: Mandatory ethics training for all employees in Korea and overseas, including contract workers (annually)

Employee Ethics Practice Programs

Online Programs

· Mandatory e-Training: The annual group-wide mandatory course, "Understanding Ethical Management" and "Workplace Bullying and Sexual Harassment Prevention Education," must be completed by all employees regardless of job category, including secretarial, contract, and part-time workers
· Group-wide Ethical Management campaigns shared through the Global Information Hub (GIH) and internal postings (e.g., ethical misconduct, bullying, sexual harassment, abuse of authority)

Offline Programs

· Introductory training for new hires, experienced hires, and interns at POSCO Group
· Pre-assignment training for newly appointed managers and new expatriates
· Ethics and human rights training for overseas subsidiaries and suppliers
· Tailored ethics training reflecting the business characteristics of each operating company
· Organization-level cascade training led by department heads
· Ethical management and human respect campaigns: group-wide campaigns for 52 operating companies (12 times per year)

Enhancing Ethical Management Expertise

· Operation of the Ethical Management Academy to upskill POSCO group auditors (audit practices and mindset courses, including understanding internal audits, logical report writing, auditor conduct, and interview techniques)
· Operation of the Human Respect Council to standardize the Group's human respect policy and sharpen the expertise of personnel in charge (key requirements for human respect investigations, investigator obligations, practical tips, and report structure and writing skills)

Compliance Training and Pledges

Compliance Training

POSCO group operates compliance training tailored to each employee level and job function, from management to working-level staff. The group provides regular compliance training for executives and specialized legal training, while helping employees internalize a compliance mindset through the Compliance Academy, fair trade campaigns, and CP handbooks.

Courses and Targets

Course	Target	Course	Target
Compliance training for POSCO group leadership	All executives	Compliance training tailored to specific job levels and functions	Working-level departments and employees in charge of CP operations, corporate group, and disclosure
Training on M&A disputes and regulatory trends for personnel at operating companies	Group legal attorneys	POSCO Group Compliance Academy	Heads of Group CP departments and working-level staff
Special training on IP management guidelines for overseas IP disputes (patents, trade secrets)	Executives and department heads in charge of Group legal affairs	Fair trade campaigns	All employees
POSCO group Compliance Manager Council	Executives in charge of Group CP operations	Preparation and distribution of CP handbooks	All employees

Employee Pledge

Each year, POSCO group employees complete online pledges to comply with fair trade and anti-corruption requirements. The fair trade compliance pledge is administered to all employees in Korea and overseas, while the global anti-corruption compliance pledge is administered in nine languages* for expatriates and global staff.

2025 Pledge Results

Fair Trade Compliance Pledge signed by
32,710employees

Global Anti-Corruption Compliance Pledge signed by
2,702employees

* Korean, English, Japanese, Chinese, Thai, Indonesian, Turkish, Vietnamese, and Spanish

STRATEGY

Strategies and Response Measures

Compliance Program

Since 2002, POSCO group has operated the Compliance Program (CP). The program currently applies a three-stage management system - prevention, response, and detection - across 35 Group companies. Through CP standards and procedures, handbooks, and employee training, POSCO group works to prevent risks before they occur. Violations are detected through ongoing monitoring and department-level self-assessments, and are addressed through sanctions, corrective actions, and recurrence-prevention measures. The program is kept effective through the CEO's statement of commitment to compliance, the appointment of compliance managers by resolution of the Board (ESG Committee), and the operation of the Compliance Council.

POSCO Group's CP Management System

PREVENTION

CP policy development and prevention activities

- Support for management CP activities
- Establishment and revision of compliance guidelines
- Tailored training, counseling, and information provision

RESPONSE

Recurrence prevention and follow-up management

- System improvement coaching and follow-up measures
- Dispute resolution and recurrence prevention
- Collaboration networking and CP activity evaluation

DETECTION

Fair trade risk monitoring

- Ongoing monitoring
- Compliance risk reviews
- Self-assessments by business departments

RISK MANAGEMENT

Risk Management

Ethical Risk Assessment

POSCO group surveys employees at domestic and overseas business sites to assess the level of ethical practice and detect risks of unethical conduct at an early stage. The Group also operates ethics sessions for executives and managers to assess the risks of unethical conduct and human respect violations. When a risk is detected, the Group carries out additional monitoring and investigations.

Ethical Risk Assessment Program

Ethical Risk Assessment

Ethics Session for Executives
Annual review of executives' Ethical Management practices

Ethics Session for Managers
Annual enhancement of ethical leadership among managers

Ethical Risk Identification Survey
Monthly survey on business misconduct and human respect violations, including sexual harassment and workplace bullying

Ethical Risk Monitoring

All employees in internal audit departments conduct monitoring throughout the year as part of risk management. Significant findings are escalated into audits. To prevent recurring and predictable risks, including fraud and errors, POSCO group has established a Risk Management System (RMS), applied it across company operations, and conducts real-time monitoring.

Checklist for Overseas Subsidiaries

Given the geographic constraints that make real-time monitoring difficult, POSCO group operates a Group-level core business checklist for overseas subsidiaries. Overseas subsidiaries periodically review their management practices across major business areas, including management, procurement, production, facilities, raw materials, investment, and sales, and identify risks to prevent incidents. The internal audit department of each operating company periodically audits the results of core business checklist reviews and, when necessary, conducts on-site due diligence at overseas subsidiaries.

Overseas Subsidiary Checklist Inspection Items

Key Items in the Core Business Checklist for Overseas Subsidiaries

Application of Standards

- Whether newly established or revised headquarters regulations have been communicated to overseas subsidiaries
- Whether newly established or revised checklists have been applied by overseas subsidiaries

Operation Status

- Whether processes are followed, including responsible parties, frequency, and management methods
- Review of the appropriateness of outputs submitted during regular inspections

Ethics and Compliance Audit System

POSCO Holdings maintains year-round oversight of ethics and compliance risks across its business and organization through ethics assessments, ethical risk monitoring, and reviews based on overseas subsidiary checklists. If unusual signs or potential violations are identified during the review process, POSCO Holdings conducts ad hoc ethics and compliance audits based on the findings. Audit findings are used for root-cause analysis and linked to system improvements and recurrence-prevention measures. POSCO Holdings conducts annual ethics assessments at all domestic and overseas business sites and carries out on-site audits where risks are identified. Through these efforts, the group-wide Ethical Management system is kept in place and continually refined.

ISO 37301/37001 Certifications

POSCO group has obtained and maintains international ISO certifications to ensure the objectivity and reliability of its ethics and compliance management system. POSCO E&C in the infrastructure sector and POSCO Future M in the rechargeable battery materials sector have obtained ISO 37301 (Compliance Management Systems) certification, while POSCO WIDE and POSCO A&C in the infrastructure sector have obtained ISO 37001 (Anti-Bribery Management Systems) certification.

RISK MANAGEMENT

Risk Management

CP Risk Assessment

Following the launch of the holding company structure in 2022, POSCO Holdings conducted a risk assessment of the Compliance Program (CP). Based on the assessment of importance to the business and stakeholders, restrictions on holding company activities and corporate group regulations were identified as priority management areas. POSCO Holdings manages related risks through compliance coaching and monitoring tailored by regulatory theme and department.

Assessment Items

Importance to Business

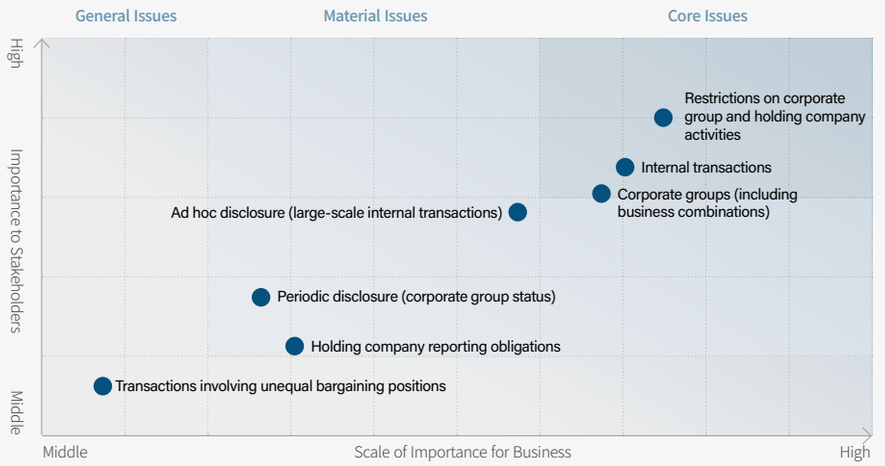
- Transaction size and frequency risk
- Fair Trade Commission regulatory risk
- Employee compliance awareness and knowledge risk

Importance to Stakeholders

- Specially related party risk
- Other stakeholder risk
- Government agency risk (other than the Fair Trade Commission)

Assessment Results

Priority Management Areas
Restrictions on holding company activities and corporate group regulations



Improvement Actions

- Compliance TF for restrictions on holding company activities: resolved all 31 applicable cases
- Regular compliance checklist reviews: focused monitoring of corporate group compliance requirements
- Level-specific online/offline training: 11 sessions each in H1 and H2 2025

METRICS AND TARGETS

Metrics and Targets

POSCO Group's CP Ratings (Fair Trade Commission)

To sharpen the effectiveness of its fair trade CP, POSCO group actively uses the Fair Trade Commission's CP rating evaluation system. As of 2026, 16 Group companies hold valid ratings.

1 company	7 companies	8 companies
AAA RATING	AA RATING	A RATING
POSCO E&C	POSCO INTERNATIONAL POSCO FUTURE M POSCO FLOW POSCO STEELEON POSCO M-TECH POSCO A&C eNtoB	POSCO DX POSCO Mobility Solution POSCO WIDE POSCO MC MATERIALS POSCO PR-TECH POSCO PH-SOLUTION POSCO GYR-TECH POSCO GY-SOLUTION

*As of March 2026

Biodiversity

TNFD REPORT*

Executive Oversight and Execution

POSCO Holdings oversees natural capital-related strategy at the executive level, from development through implementation, covering dependencies, impacts, risks, and opportunities. It also works with specialized institutions, including the National Institute of Ecology and the POSCO Research Institute, to reinforce the scientific basis of its analysis.

Following POSCO Holdings' membership in the Taskforce on Nature-related Financial Disclosures (TNFD) Forum in 2022, POSCO, POSCO International, POSCO E&C, and POSCO Future M—the Group's four major operating companies—also joined the TNFD Forum in June 2024. Human rights policies and engagement activities for Indigenous Peoples and local communities are a key part of natural capital risk management. At PT.BIA in Indonesia and the POSCO Argentina lithium business site, joint environmental monitoring systems are operated with the participation of nearby village residents, government officials, and external experts.

Biodiversity Policy

POSCO group recognizes biodiversity conservation and restoration as key priorities in sustainability management. To help build an industrial ecosystem in harmony with nature, the Group has established its Biodiversity Policy and puts it into practice across its operations. Developed in response to the TNFD, the policy sets out the management framework and implementation principles for integrating biodiversity considerations into all business activities.

POSCO HOLDINGS Biodiversity Policy → POSCO INTERNATIONAL Biodiversity Policy ↗
POSCO E&C Biodiversity Policy ↗ POSCO FUTURE M Biodiversity Policy ↗

LEAP Approach

The LEAP approach sits at the core of the TNFD recommendations, enabling companies to analyze how their business activities interact with natural capital and assess the resulting financial risks and opportunities. In 2025, POSCO Holdings applied the LEAP approach, the TNFD's core analytical framework, across all Group business sites to assess biodiversity-related risks and opportunities.

Phase	Key Details
Locate	**Identify business sites and regions that interface with natural capital** · Assess proximity to protected areas (PAs) and Key Biodiversity Areas (KBAs) using business site location data and global databases such as the Integrated Biodiversity Assessment Tool (IBAT) and Global Ecoregions 2017
Evaluate	**Analyze dependencies on ecosystem services (the various benefits nature provides to the economy and society) and impacts on biodiversity** · Conduct quantitative, sector-specific assessments using the Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) tool
Assess	**Assess the materiality of nature-related physical and transition risks and opportunities** · Select priority business sites by weighting risk filter results with financial materiality and stakeholder relevance
Prepare	**Develop response strategies and establish a disclosure framework** · Develop mitigation hierarchy-based response plans for priority business sites and make disclosures in line with the TNFD recommended structure

* For information on the highest decision-making body related to the Biodiversity topic, please refer to ESG Governance Framework > Board and ESG Committee.

Business Site Locations and Sector Analysis

Under the first phase of the TNFD LEAP approach, POSCO Holdings defined the scope of business activities subject to natural capital assessment as follows.

As of the end of 2024, POSCO group's operations covered 193 entities and 207 business sites across 29 countries, spanning 14 sectors and 40 subgroups under the International Standard Industrial Classification (ISIC). By sector, the Group's operations consist of 85 manufacturing sites (41%), 31 wholesale and retail trade sites (15%), 30 financial and insurance sites (14%), 11 construction sites (5%), 10 transportation and storage sites (5%), and 3 agriculture, forestry and fishing sites (1%). Unlike typical manufacturing companies, POSCO group has a vertically integrated structure that extends upstream to raw material extraction and cultivation. The Group owns multiple upstream subsidiaries in areas such as lithium (including POSCO Argentina), nickel (including SNNC), gas development (including POSCO International's Shwe Gas Project in Myanmar), iron ore (including POS-ORE PTY LTD), and palm oil (PT.BIA).

The 2025 LEAP assessment focused primarily on directly operated business sites, including self-owned upstream assets.

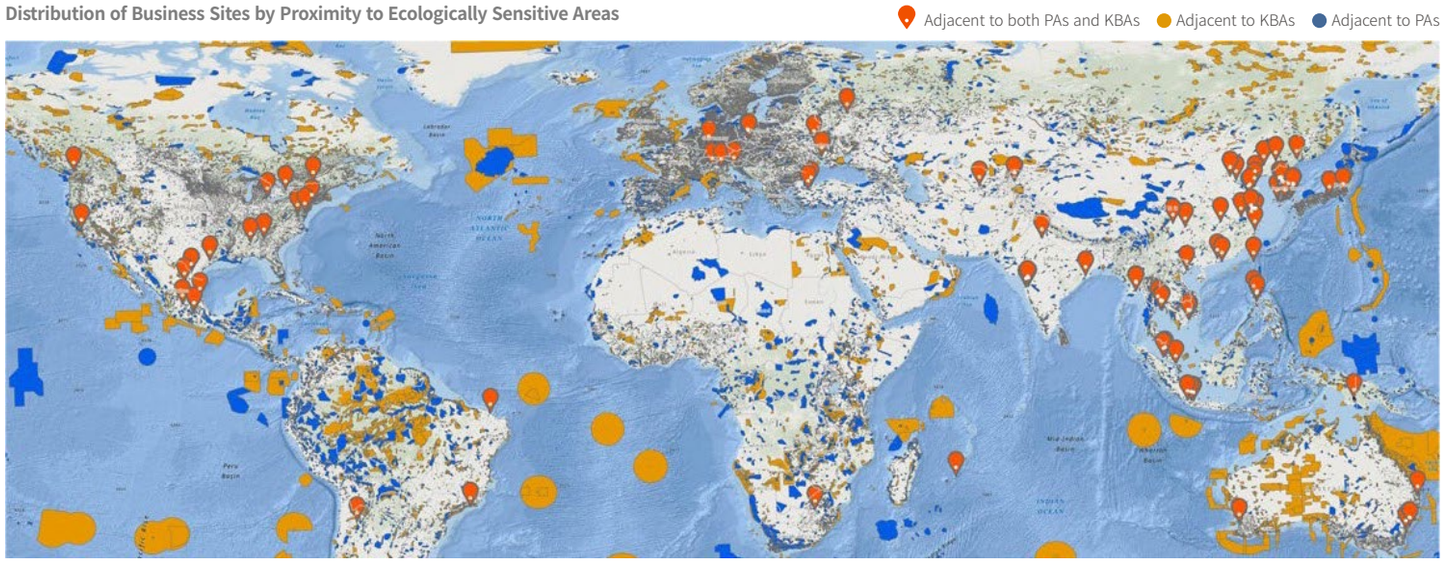
Distribution of Business Sites by Industry

Category	Number of sites	Share of sites
Manufacturing	85	41%
Wholesale and retail trade	31	15%
Financial and insurance	30	14%
Construction	11	5%
Transportation and storage	10	5%
Agriculture, forestry and fishing	3	1%
Others	37	19%
Total	207	100%

Identifying Business Sites Located Near Ecologically Sensitive Areas

Using satellite coordinates for 207 business sites, POSCO Holdings cross-referenced global biodiversity databases, including IBAT Key Biodiversity Areas (KBAs), Protected Areas (PAs), and the International Union for Conservation of Nature (IUCN) Red List, to assess each site's spatial interface with ecologically sensitive areas. The analysis found that 57 business sites, or 28% of all sites, are located near PAs and KBAs. These results enabled POSCO Holdings to identify business sites located near ecologically sensitive areas at an early stage and set priorities for follow-up in-depth assessment.

Distribution of Business Sites by Proximity to Ecologically Sensitive Areas



EVALUATE PHASE

Evaluation of Sector-specific Dependencies and Impacts

In the Evaluate phase of the TNFD LEAP approach, POSCO Holdings classified Group businesses based on ISIC and used the ENCORE tool to quantitatively assess each sector's dependencies on and impacts on natural capital. Agriculture scored highest for both dependency and impact, followed by lithium and nickel, steel, rechargeable battery materials, and energy in terms of their interface with natural capital.

Natural Capital Dependencies in Key Sectors (Business Sites)

* While ENCORE presents dependencies and impacts on natural capital using five levels —Very High (VH), High (H), Medium (M), Low (L), and Very Low (VL)—POSCO Holdings restructured these into three categories: (Low Medium High)

Sector	Sub-category	Biomass Provisioning Services	Genetic Material Services	Water Resources	Climate Regulation	Rainfall Pattern Regulation Services	Air Filtration Services	Soil and Sediment Retention Services	Solid Waste Remediation	Water Quality Regulation	Flood Regulation	Storm Mitigation Services	Pest and Disease Regulation	Pollination	Water Purification
Agriculture															
Lithium and nickel															
Steel	Steel manufacturing														
	Non-ferrous metal manufacturing														
Rechargeable battery materials	Basic chemical manufacturing														
	Non-metallic mineral manufacturing														
	Electrical motor and equipment manufacturing														
	Raw material recycling and recovery														
Energy															

Natural Capital Impacts in Key Sectors (Business Sites)

* While ENCORE presents dependencies and impacts on natural capital using five levels —Very High (VH), High (H), Medium (M), Low (L), and Very Low (VL)—POSCO Holdings restructured these into three categories: (Low Medium High)

Sector	Sub-category	Disturbance (light, noise)	Freshwater Use Areas	Emissions of GHG	Emissions of non-GHG Air Pollutants	Generation and Release of Solid Waste	Area of Land Use	Emissions of Toxic Pollutants to Water and Soil	Emissions of Nutrient Pollutants to Water and Soil	Volume of Water Use	Introduction of Invasive Species
Agriculture											
Lithium and nickel											
Steel	Steel manufacturing										
	Non-ferrous metal manufacturing										
Rechargeable battery materials	Basic chemical manufacturing										
	Non-metallic mineral manufacturing										
	Electrical motor and equipment manufacturing										
	Raw material recycling and recovery										
Energy											

1) The ISIC classification was adapted to reflect POSCO Holdings' business areas.

ASSESS PHASE

Selection of Priority Business Sites for Natural Capital Management

Under the Assess phase of the TNFD approach, POSCO Holdings evaluated the materiality of natural capital for business sites, focusing on sectors with strong interactions with nature capital. Of the sites identified as highly material in terms of dependencies on and impacts on natural capital, 10 were ultimately selected as priority sites for natural capital management after further consideration of financial materiality and stakeholder relevance.

The assessment was conducted using external tools, including the Biodiversity Risk Filter (BRF) and Water Risk Filter (WRF) of the World Wide Fund for Nature (WWF), as well as the Integrated Biodiversity Assessment Tool (IBAT). In particular, the IBAT-based Species Threat Abatement and Restoration (STAR) index was applied to quantitatively analyze the ecological importance of each site in relation to endangered species protection and habitat restoration.

Priority Business Sites for Natural Capital Management

Category	Company and business site	Country	Biodiversity Physical Risk (BRF)	Water Physical Risk (WRF)	STAR (IBAT)	Sensitive Areas (IBAT)	Financial Materiality	Stakeholder Relevance
1. Agriculture	PT.BIA Estate B, Estate C, Plasma Division 2	Indonesia	3.28[1)]	2.17[1)]	High	High	High	High
2. Lithium and nickel	POSCO Argentina	Argentina	3.19	2.55	Medium	High	Medium	High
3. Steel	POSCO Pohang Works	Republic of Korea	3.70	2.83	Medium	High	High	Low
	POSCO Gwangyang Works	Republic of Korea	3.76	2.51	High	High	High	Low
	POSCO Yamato Vina	Vietnam	3.56	3.07	Medium	Medium	Low	Medium
	PT.Krakatau POSCO	Indonesia	3.43	2.45	High	Medium	Medium	High
4. Rechargeable battery materials	POSCO FUTURE M Gwangyang Cathode Plant	Republic of Korea	3.69	2.63	High	Medium	Medium	Medium
5. Energy	POSCO International Incheon LNG Combined Cycle Power Plant	Republic of Korea	4.09	3.4	High	Low	Low	Low
	POSCO International Gwangyang LNG Terminal	Republic of Korea	3.69	2.57	High	Medium	Medium	Medium
	POSCO International Shwe Gas Project in Myanmar	Myanmar	3.42	3.37	High	High	High	High

1) Average value of the applicable business site

Measurement Metrics

Category	Indicator	2025 Performance	Remarks
Impact	Share of sites near ecologically sensitive areas	28% (57 sites)	IBAT-based spatial proximity analysis for PAs/KBAs
	Number of priority business sites	10 sites	Based on the integrated score from the Assess phase
	Area of conservation areas excluded from development (HCVA)	6,454ha (PT.BIA)	Permanently designated for conservation under the NDPE[1)] policy
	Area of protected areas managed with local communities	139,600ha	Danau Bian Wildlife Reserve agreement (2023)
Response	Number of entities that joined the TNFD Forum	5 companies	POSCO Holdings and four major operating companies
	RSPO[2)]-certified palm operations	All 3 sites (PT.BIA)	RSPO certification maintained
	Sites under quarterly joint monitoring	4 sites	3 PT.BIA areas + POSCO Argentina
	Freshwater-use reduction technology applied	50~80% reduction	POSCO Argentina BPED[3)] process

1) No Deforestation, No Peat, No Exploitation (NDPE)
2) Roundtable on Sustainable Palm Oil (RSPO)
3) Bipolar Electrodialysis (BPED)

POSCO Argentina: Environmental, Water Resources, and Biodiversity Management Activities

Overview

POSCO Argentina S.A.U., a wholly owned subsidiary of POSCO Holdings, secures and produces lithium resources for POSCO group's rechargeable battery materials business. In 2018, the Company acquired the Hombre Muerto salt lake, which spans Argentina's Salta and Catamarca provinces, and began brine-based lithium development. With the Phase 2 plant, which broke ground in 2023, still under construction, the Phase 1 plant has been in operation since 2024. Located on the Andean Plateau, the salt lake is an area of high ecological value and provides habitat for rare wildlife, including flamingos. POSCO Argentina is therefore carrying out systematic biodiversity management activities to conserve ecosystems within its area of influence. Selected as the second-priority site through the LEAP assessment, the lithium salt lake is covered in this section through its biodiversity conservation efforts.

01 Environmental Management

① Environmental Monitoring

To transparently communicate project progress and environmental impacts, POSCO Argentina conducts environmental monitoring on a monthly and quarterly basis with the participation of employees, government officials, external experts, and representatives of indigenous communities. The monitoring covers flora, fauna, extremophile microorganisms, limnological analysis, physicochemical air quality analysis, noise, surface and groundwater quality, soil quality, and wastewater management, enabling the Company to systematically track and manage environmental variables.

Monitoring: As the Phase 2 brine lithium plant is located in an area spanning two provinces, expanded monitoring is conducted with the Catamarca Mining Undersecretariat and local village residents.
Participants: Technical staff from the Salta Mining Undersecretariat, external experts, residents of Pocitos and Santa Rosa de los Pastos Grandes (SRPG), and POSCO Argentina employees
Survey activities: Prior training is provided on air, water, soil, wastewater, and noise monitoring, followed by joint sampling and analysis with community participation

Joint Environmental Monitoring by POSCO Argentina and External Experts

② Environmental Regulations and Training

POSCO Argentina operates structured environmental training for new hires, suppliers, and contractors. As of March 2026, the Company had delivered 112 sessions at high-altitude business sites, with 1,210 cumulative participants and 64 hours of training. The curriculum covers a broad range of environmental topics, including waste management, biodiversity conservation, and wildlife rescue. POSCO Argentina also conducts ad hoc inspections of compliance with on-site environmental management standards to identify and correct deficiencies, while regularly providing road safety training to local employees, logistics personnel, and indigenous communities.

General Rules

- Prohibit igniting fires or harvesting plants in unauthorized locations
- Prohibit the introduction or breeding of non-native livestock, such as cats, in the salt lake area
- Ensure access to water sources for wildlife and bolster patrols around the operational site
- Promptly rescue and treat injured animals and assist their return to the wild

Road Traffic Regulations

- Drive only on roads for which a permit has been obtained and minimize the use of new roads
- Reduce the use of horns and lighting to minimize the threat to animals
- In the event of an accident, immediate emergency action must be taken and documented/reported on site.

02 Water Resource Management

① Water Resource Impact Assessment and Community Support

POSCO Argentina's lithium business site is located in Salta and Catamarca provinces, which are classified by the World Resources Institute (WRI) as areas with high water stress, or water scarcity risk. Although the broader region is rated High, a detailed analysis based on the coordinates of the business site found that the salt lake itself is rated Low. Given the challenges local residents face in securing water in high-altitude areas, POSCO Argentina regularly provides water trucks to nearby villages, including Tolar Chico in Salta Province, to support the community's access to water.

Water Stress	Groundwater Development	Application of BPED[1] Technology	Hydrological Modeling
· Based on WRI map coordinates, the salt lake at the business site is rated Low, while the broader Salta and Catamarca provinces are rated High	· Development and use of dedicated groundwater below 80m, isolated from surface water · Securing water sources with no impact on local ecosystems or residents' domestic water use	· POSCO Holdings' BPED process reduces water use by 50-80% compared with conventional commercial processes · Continued application as operations expand	· Long-term groundwater depletion analysis using hydrological modeling supported by expert consultants · Regular reporting of water withdrawal volumes and water level data to the provincial government

1) BPED(Bipolar ElectroDialysis)

② Water Withdrawal Permits and Compliance

In accordance with Argentine law, POSCO Argentina obtains prior approval from the Salta Provincial Water Authority before withdrawing groundwater and fulfills the obligations attached to its permits, including regular monitoring, compliance with permitted withdrawal volumes, and pump testing. The company currently holds groundwater withdrawal permits SRH 1340, 1406, and 1407 in the Hombre Muerto salt lake area, each of which is renewed annually. To assess potential impacts on surface water resources, the Company shares water quantity and quality survey results with residents and conducts joint water quality monitoring once a year with residents directly participating in the process.

Flow Meter and Water Use Management	Regular Pumping Tests and Water Use Management	On-site Inspection and Environmental Management
· Continuously check whether flow meters are operating properly · Record and manage daily and cumulative water use · Regularly compile water use by withdrawal well and manage reporting to water resources authorities	· Conduct pumping tests twice a year, on a semiannual basis · Test items include drawdown, recovery, specific capacity, well efficiency, aquifer loss, and other indicators · Conduct physical and chemical water quality analysis during the testing period	· Maintain proper operation of water intake control devices · Manage valves and locking systems to prevent unauthorized discharge · Operate facilities to minimize impacts on the surrounding environment, including aquifers, soil, water systems, and biota

Water Withdrawal Permission	Compliance with flow rate and operating hours: 3,116 m^3/day in total	SRH 1406 (CG02): 83m^3/h, up to 16 hours/day / 1,328 m^3/day
	SRH 1340 (CG01): 32.85m^3/h, up to 14 hours/day / 459.9 m^3/day	SRH 1407 (CG03): 83m^3/h, up to 16 hours/day / 1,328 m^3/day

03 Biodiversity Management

① Monitoring of Key Flora and Fauna Distribution

Since 2023, POSCO Argentina has monitored flora and fauna near the salt lake every quarter in collaboration with external biodiversity experts. Once a year, the Company also conducts joint monitoring with local residents, Indigenous Peoples, and the provincial government, and shares the results transparently with the local community. The vicuña (Vicugna vicugna), classified as an endangered species by the International Union for Conservation of Nature (IUCN), is one of the key species found near the site. Various other mammal, bird, and plant species have also been observed. Based on data accumulated through long-term monitoring, POSCO Argentina plans to analyze the impact of its operations on the local ecosystem and develop conservation measures accordingly.

Distribution of Key Fauna

(Unit: Population)

Category	Order	Family	Species	2023.06	2024.05	2025.06	2023.12	2024.11	2025.11
Mammals	Artiodactyla	Camelidae	Vicugna vicugna	137	39	119	36	16	40
	Perissodactyla	Equidae	Equus africanus asinus	15	9	11	23	0	9
Birds	Phoenicopteriformes	Phoenicopteridae	Phoenicoparrus jamesi	0	21	15	0	75	190
	Passeriformes	Furnariidae	Geositta punensis	36	129	24	25	58	47
		Thraupidae	Phrygilus atriceps	2	3	4	0	11	23

Distribution of Key Flora

(Unit: Population)

Family	Species	2023.06	2024.05	2025.06	2023.12	2024.11	2025.11
Asteraceae	Artemisia copa	107	230	297	461	591	33
	Chuquiraga atacamensis	11	13	35	146	237	9
	Senecio viridis	257	80	29	1,274	222	9
Fabaceae	Adesmia horrida	1,663	908	488	3,777	2,703	233
	Adesmia erinacea	0	131	56	92	320	10
Cactaceae	Maihueniopsis glomerata	9	54	10	34	74	6
Poaceae	Festuca orthophylla	452	113	117	370	73	190
Verbenaceae	Aloysia deserticola	1,234	513	391	77	654	165

※ Notes on Fluctuations in Observed Populations

The observed populations of flora and fauna may be affected by a combination of factors, including differences in survey personnel and survey timing (monthly and seasonal), changes in climate and precipitation, inter-annual natural variability in high-altitude arid environments, and weather conditions on the day of the survey. Accordingly, the data should be interpreted as monitoring data that show point-in-time fluctuations, and there are limitations in attributing them to a sustained decline in specific species or to the impacts of business operations.

Observed vicuña (Vicugna vicugna)

Observed James's flamingo (Phoenicoparrus jamesi)

② Species Protection Plan

Throughout the project lifecycle, from pre-construction and construction through the period prior to project closure, POSCO Argentina implements measures such as relocating lizards and rodents, maintaining biologists on site, and preventing wildlife from entering operational areas. The company also applies site driving rules to minimize risks to wildlife. When injured animals are found, they are immediately rescued and treated, and are returned to the wild where possible.

③ Soil Restoration Plan

At project closure, soil samples will be collected and analyzed from areas such as oil storage tanks and hazardous waste storage areas. Remedial measures will be taken for any contaminated soil. All installed structures will be dismantled, and the project site will be graded and leveled. Topsoil will be stored separately and reused as soil for site restoration after the plant is decommissioned. The soil restoration plan will also make use of the natural recovery capacity of high-altitude environments, which can support the re-establishment of flora and fauna within a relatively short period.

Pre-construction Phase	Construction Phase	Project Closure Phase
Capture lizards and rodents using traps and release them into nearby safe areas	Maintain biologists on site and implement wildlife deterrence and relocation measures	Remove structures and level the site; store topsoil separately for restoration and reuse

④ Environmental Restoration and Reforestation Plan

To restore vegetation in areas that have been damaged or disturbed, POSCO Argentina plants and manages native and locally adapted species. In 2023, POSCO Argentina carried out forest restoration along the pipeline route of the lithium hydroxide plant in the lowland General Güemes area. Monthly monitoring is now conducted to track the growth and survival rates of planted species. Going forward, the monitoring frequency will be adjusted to quarterly depending on vegetation establishment and stability, supporting the restoration of ecological functions and the conservation of biodiversity.

04 Energy Transition Roadmap

As part of its renewable energy expansion strategy, POSCO Argentina is pursuing the introduction of solar power facilities. Going forward, the Company plans to transition to an integrated power system that combines photovoltaic (PV) power and LNG, securing a stable energy supply while steadily reducing GHG emissions. It is currently carrying out permitting and related procedures for the transition to solar power generation, and plans to continue increasing the share of renewable energy in its energy mix.

Establish an integrated power system based on photovoltaic (PV) power and LNG by Q4 2027

PT.BIA: Biodiversity Management System and Activities

Overview

POSCO International operates RSPO (Roundtable on Sustainable Palm Oil)-certified palm oil plantation in Papua through the Company's subsidiary PT Bio Inti Agrindo (PT.BIA). Through the application of the TNFD LEAP approach, PT.BIA was identified as the business site with the highest level of dependency and impact on natural capital. The site is also located adjacent to the Lake Bian Wildlife Reserve (LBWR), an area of high biodiversity significance. Accordingly, PT.BIA operates conservation activities in High Conservation Value Areas (HCVAs) within the concession area and implements a long-term conservation program for LBWR outside the concession area.

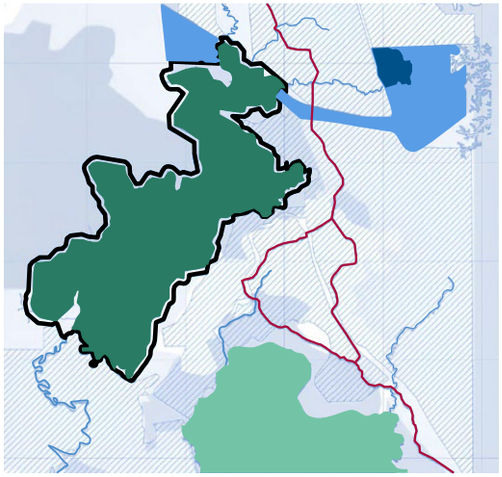
01 Policy

POSCO International has established a Biodiversity Policy to protect and promote biodiversity across its business activities. To support the sustainable operation of its palm plantation, PT.BIA has also established a No Deforestation, No Peat, No Exploitation (NDPE) policy and operates quarterly implementation plans across four key areas: policy and governance, environmental conservation, human rights, and stakeholder engagement.

POSCO INTERNATIONAL Biodiversity Policy PT.BIA NDPE Policy

02 Biodiversity Management Framework

POSCO International manages biodiversity through a governance structure that links ESG decision-making at headquarters with on-site implementation at PT.BIA. The Sustainability Management Group at headquarters regularly reviews the overall status of PT.BIA, while material issues are reviewed by the ESG Committee. In addition, biodiversity-related key performance indicators (KPIs) are incorporated into executive performance objectives to monitor implementation progress.



① Business Site Assessment

PT.BIA's palm plantation is located adjacent to the boundary of a high water-stress area in Merauke may therefore be assessed as being at relatively high risk based on external assessment tools. However, the actual concession area is located outside the high-risk zone, and the level of risk within the site may therefore differ from the assessment results. Accordingly, there are limitations to uniformly applying the results of external assessment tools across the entire business site.

Water Stress Area

Analysis using the WRI Aqueduct Tool classified the palm plantation as being located in a high water-stress area in Merauke. However, this result reflects the limitations of spatial analysis associated with the plantation's extensive geographic footprint. As the actual concession area is located adjacent to, but outside, the boundary of the high-risk area, the level of risk within the site may differ from the assessment results.

Biodiversity Conservation Area

The palm plantation is located adjacent to diverse ecosystems, including tropical rainforests, wetlands, and rivers, and is located adjacent to the Upper Kumbe Key Biodiversity Area and the Danau Bian Protected Area, where approximately 18 endangered species, including the IUCN Red List-listed pig-nosed turtle, have been identified. All of these areas are located outside the concession area.

② Establishment of Managed Areas within the Concession Area

Activity	Description	Excluded Area	Developable Area
Concession Area Permit	· Obtained Izin Lokasi, the concession area permit issued by the Indonesian Investment Coordinating Board · Conducted the Indonesian Environmental Impact Assessment (ANDAL) process and reviewed site characteristics to confirm the feasibility of land conversion	-	39,900ha
Forest Area Release Decree	· Obtained the Forest Area Release Decree (SKPKH) for areas designated for development, excluding protected wildlife areas	3,500ha	36,400ha
Land Use Rights	· Obtained Land Use Rights (HGU) and plant development permits after excluding areas requiring protection from the area covered by the Forest Area Release Decree	2,205ha	34,195ha
Voluntary Environmental Assessment	· Voluntarily designated protected areas, including high conservation value forests, wetlands, and waterways, and determined the final developable area by excluding these areas from development	6,454ha	27,741ha

03 Policies and Management Systems

① Establishment of the 2025 NDPE Action Plan

POSCO International established and disclosed the 2025 NDPE Action Plan for its Indonesian palm business to regularly monitor NDPE implementation and strengthen its implementation in a systematic manner. Quarterly implementation plans were established across the four key areas of the NDPE policy: policy and governance, environmental conservation, human rights, and stakeholder engagement. POSCO International also reviews its mid- to long-term implementation strategy. As part of its biodiversity conservation efforts, PT.BIA conducts ongoing conservation activities across 6,454 ha of High Conservation Value Areas (HCVAs) within the palm plantation. It also implements a long-term LBWR conservation program for the Lake Bian Wildlife Reserve (LBWR) outside the concession area, along with wildlife rescue and rehabilitation and fire prevention and response activities.

② Operation of Monitoring and Reporting Systems

PT.BIA operates an integrated management system using SMART Patrol, water quality monitoring, and fire monitoring data, with related information managed through the LBWR database. PT.BIA also uses 18 key performance indicators (KPIs) to monitor conservation. The operation of the KPIs and the implementation of the program are independently reviewed by the HCV Network Secretariat. In addition, PT.BIA operates a stakeholder advisory system and a public grievance mechanism, and undergoes financial audits by an independent external institution to ensure transparency in program operations.

04 Environmental Conservation and Management

① Biodiversity Conservation Activities in HCV Areas within the Concession Area

PT.BIA conducts regular monitoring to assess the conservation status of High Conservation Value Areas (HCV Areas) within the concession area. In 2025, it used Global Forest Watch (GFW) to conduct drone monitoring of HCV Areas and wildlife corridors. The monitoring confirmed that no additional land clearing had taken place.

PT.BIA also conducted on-site monitoring to assess biodiversity status and carbon stocks within HCV Areas, confirming the presence of 46 bird species. Vegetation and biomass surveys were carried out using Permanent Unit Plots (PUPs). PT.BIA also operates nurseries and plants native tree species in Papua as part of its vegetation restoration efforts.

② Restoration of Riparian Buffer Zones within the Concession Area

PT.BIA conducts restoration activities to restore the ecological functions of riparian buffer zones within the concession area. PT.BIA restores vegetation by defining riparian zone boundaries and planting native and naturally regenerative species, while also conducting maintenance activities in areas affected by sediment deposition and waterway degradation. These restoration activities are being implemented in phases under a five-year plan. PT.BIA manages the protective functions of riparian buffer zones over the long term through measures such as installing boundary markers, revegetation and supplementary planting, and water quality and biodiversity monitoring.

③ Conservation Activities in Protected Areas outside the Concession Area

In accordance with the RSPO RaCP, PT.BIA operates a long-term biodiversity conservation program for the Lake Bian Wildlife Reserve (LBWR). In 2025, PT.BIA collaborated with the Papua Natural Resources Conservation Agency (BBKSDA) and community patrol groups (MPA) to conduct SMART Patrol-based joint patrols and biodiversity monitoring, while checking land use status and ecosystem conditions. PT.BIA also monitors signs of fire using NASA FIRMS satellite data and on-site monitoring, while providing forest fire prevention and response training for community fire patrol groups (MPA). In cooperation with BBKSDA, PT.BIA supports the release of rescued and rehabilitated wildlife into their natural habitat as part of its protected species conservation activities.

05 Support for Conservation Management

① Establishment of Joint Protected Area Management and Patrol System

PT.BIA collaborates with the Papua Natural Resources Conservation Agency (BBKSDA), the management authority for the Lake Bian Wildlife Reserve (LBWR), and local communities to conduct joint patrols and biodiversity monitoring. In 2025, PT.BIA operated a joint patrol system involving eight villages through community patrol groups (MPA) and checked land use status and ecosystem conditions through SMART Patrol-based field patrols.

The 2025 assessment also confirmed that the target for the Management Effectiveness Tracking Tool (METT) was achieved, and PT.BIA continues to maintain a community-based protected area management system. Threats identified during patrols are incorporated into protected area management activities and are continuously monitored and managed.

06 Sustainable Economic Development

① Community-based Livelihood Support Program

PT.BIA operates a community-based livelihood support program to promote sustainable livelihoods for communities in and around the Lake Bian Wildlife Reserve (LBWR) while supporting the long-term sustainability of protected area conservation activities. In connection with the operation of community patrol groups (MPA), PT.BIA is expanding community participation in protected area management and promoting sustainable livelihood programs that strengthen local income-generating opportunities.

PT.BIA also carries out education, capacity-building, and community support activities to promote both protected area conservation and community development. In addition, PT.BIA implements a long-term biodiversity conservation program in collaboration with local communities.

07 Integrated Fire Management

① Operation of an Integrated Fire Management system

PT.BIA operates an integrated fire management system for protected areas near to the concession area, using satellite data and on-site monitoring. In 2025, PT.BIA used MODIS and VIIRS satellite data from NASA FIRMS to monitor potential fire activity, and no fire incidents were identified within the concession area. During the dry season, PT.BIA also monitored the Fire Weather Index (FWI) published by the Indonesian Agency for Meteorology, Climatology, and Geophysics (BMKG), while managing fire risks through drone-based on-site monitoring.

② Strengthening Fire Prevention and Response Capabilities

PT.BIA works with BBKSDA and community fire patrol groups (MPA) to carry out fire prevention activities in protected areas. In 2025, PT.BIA conducted joint on-site inspections within LBWR and provided MPA members with training on forest fire response procedures, fire risk factor identification, and firefighting equipment operation. PT.BIA also continues to monitor fire risk factors in protected areas in cooperation with local communities as part of its ongoing efforts to strengthen fire prevention and response capabilities.

08 Stakeholder Engagement and Environmental Management Improvement

① Conservation Activities Based on Stakeholder Engagement

As part of the long-term LBWR conservation program, PT.BIA carries out conservation activities in cooperation with local communities. Through community patrol groups (MPA), PT.BIA works to expand community participation in protected area management and conservation activities, while conducting joint patrols, biodiversity monitoring, and fire prevention activities.

PT.BIA also works with BBKSDA, local communities, and other stakeholders to share updates on protected area management and key issues. Based on the results of the independent assessment by the HCV Network Secretariat*, PT.BIA continues to improve its performance management system and stakeholder engagement.

* The HCV Network's technical implementation body, composed of experts responsible for developing guidance and tools, supporting member companies, and implementing projects

Human Rights

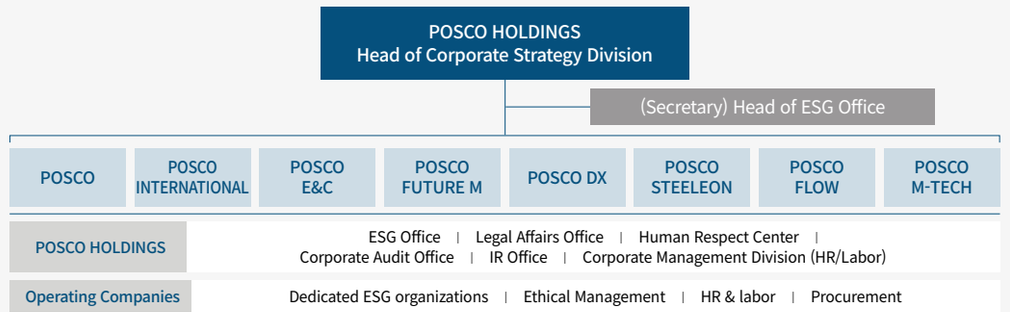
GOVERNANCE*

Organizational Structure

Group Human Rights Management Council

The Group Human Rights Management Council is a semiannual consultative body comprising POSCO group's holding company and major operating companies. It is led by the Head of the Corporate Strategy Division at POSCO Holdings, a C-level executive. In 2026, the Council widened its membership to include POSCO Flow and POSCO M-Tech, in addition to the seven companies that participated in 2025. The Council regularly monitors human rights issues that may arise across the Group's domestic and overseas operations, together with the status of human rights management. It also discusses group-wide response tasks and improvement directions, including HRIA(Human Rights Impact Assessment)plans, human rights training, and action plans for key controversies. In September 2025, the Council shared the results of HRIAs conducted at domestic business sites by each operating company. In March 2026, it discussed, among other agenda items, plans to conduct HRIAs for overseas business sites.

Composition of the Group Human Rights Management Council


POSCO HOLDINGS
Head of Corporate Strategy Division
(Secretary) Head of ESG Office
POSCO
POSCO INTERNATIONAL
POSCO E&C
POSCO FUTURE M
POSCO DX
POSCO STEELEON
POSCO FLOW
POSCO M-TECH
POSCO HOLDINGS
ESG Office | Legal Affairs Office | Human Respect Center | Corporate Audit Office | IR Office | Corporate Management Division (HR/Labor)
Operating Companies
Dedicated ESG organizations | Ethical Management | HR & labor | Procurement

Dedicated Organization

POSCO group operates dedicated human rights functions at each operating company to strengthen expertise in managing human rights risks such as workplace bullying, sexual harassment, and abuse of power. To reinforce human rights management at the holding-company level, POSCO Holdings established the Human Respect Center under the Corporate Compliance Division in 2025, separately from the ESG Office, which oversees group-wide human rights. Nine Group companies, including POSCO Holdings, operate dedicated human rights organizations. Human rights responsibilities are divided into three areas: human rights policies and systems, HRIAs, and grievance handling. The ESG Office and other sustainability functions lead human rights policies, systems, and HRIAs, while Corporate Audit, Human Respect, Legal Affairs, and ESG functions handle grievances by report type in cooperation with relevant departments.

* For details on the highest decision-making body for human rights-related matters, see "ESG Governance Framework > BOD and ESG Committees".

Human Rights Management Areas and Responsibilities

Area	Key Details
Human rights policies and systems	Establishing and revising human rights management policies and procedures, Establishing HRIA plans and methodologies, Reporting HRIA results to management and the Board, Operating the Group Human Rights Management Council, Providing training to support the internalization of human rights management for employees and stakeholders
HRIA	Identifying and preventing human rights impacts, Establishing action plans, Updating standard HRIA checklists, Conducting HRIAs for employees, Identifying and addressing human rights-related improvements
Grievance handling	Receiving grievances and providing counseling or investigation, Evaluating the effectiveness of grievance channels, Reviewing improvements related to grievance handling operations

Human Rights Management Policy

POSCO group established the Group Human Rights Management Declaration to practice human rights management in line with global standards. In February 2025, the Declaration was jointly signed and proclaimed on behalf of the Group by the Group Representative Director & CEO and the CEOs of six operating companies: POSCO, POSCO International, POSCO E&C, POSCO Future M, POSCO DX, and POSCO Steeleon. In 2026, POSCO Flow and POSCO M-Tech also joined the initiative, expanding the scope of human rights management across the Group. To extend human rights management to overseas business sites, POSCO group translates and applies the Group Human Rights Management Declaration and two human rights guidelines—the Guiding Principles for Grievance Handling Procedures and the Guiding Principles for Human Rights Due Diligence—in local languages, including English, Chinese, Japanese, Spanish, and Indonesian. Through these efforts, POSCO group is embedding human rights management globally so employees at all business sites understand and practice its values.

POSCO group Human Rights Management Declaration

Human Rights Risk Review and Monitoring System

The ESG Office of POSCO Holdings regularly reviews human rights risks, and the Human Respect Center and the Corporate Audit Office conduct audits when necessary. Since 2023, POSCO Holdings has operated a monthly survey system for all employees to identify violations of human respect standards. POSCO Holdings holds annual ethics sessions to detect ethical misconduct and violations of human respect standards by executives and position holders in advance. In the executive session, efforts to build an organizational culture of human respect are included as an evaluation item and reviewed.

UNGC Member Companies

As members of the United Nations Global Compact (UNGC), POSCO Holdings, POSCO, POSCO International, and POSCO E&C embed the Ten Principles on human rights, labor, the environment, and anti-corruption across POSCO group's management activities. Since 2024, POSCO group has participated in the Business and Human Rights Accelerator Program, operating a human rights due diligence process aligned with international human rights standards, and achieving progress in human rights management, including Group-level HRIAs and more advanced human rights risk management.

STRATEGY

Impacts, Risks, and Opportunities

POSCO Holdings keeps track of changes in labor and human rights regulatory environments across all business sectors, including steel, infrastructure, and rechargeable battery materials. These include domestic and international labor laws and standards of the International Labour Organization (ILO).
In its own operations, POSCO Holdings continues engagement activities to maintain stable labor-management relations, as regulatory requirements related to social dialogue, including freedom of association and collective bargaining rights, continue to tighten. Across upstream operations, POSCO group monitors regulatory trends related to supply chain human rights due diligence, including the expansion of obligations on working conditions and occupational safety and health across suppliers and contractors, as well as the European Union Corporate Sustainability Due Diligence Directive (CSDDD). The Group is gradually refining its supply chain management system in response.

Strategies and Countermeasures

Strategic Framework for Human Rights Management

Human rights management is aligned with Responsible Value Chain and Employee Happiness, which fall under the Social (S) pillar of POSCO group's G.R.E.E.N. Framework. POSCO group has conceptualized its human rights management strategy as the ESC Framework, centered on three key stakeholder groups: employees, the supply chain, and local communities. ESC is more than an acronym for Employees, Supply Chain, and Community. It also carries the meaning of ESCape --identifying, preventing, mitigating, and addressing potential negative human rights impacts across 11 management areas to move beyond human rights risks --and ESCalate, which reflects the Group's commitment to creating and enhancing sustainable corporate value.

POSCO Group Human Rights Management Framework

S Pillar of the G.R.E.E.N Framework

Strategic Framework for Human Rights Management

* Represents both ESCape, which refers to moving beyond human rights risks, and ESCalate, which reflects POSCO group's commitment to creating and enhancing sustainable corporate value

Strategies and Countermeasures

Corrective and Preventive Actions for Human Rights Violations

POSCO group operates a group-wide Human Respect Program to prevent discrimination and harassment and build a workplace culture in which all employees are treated with respect. Through the Human Respect Program, all employees take part in awareness-raising activities, including regular human rights and diversity training, human rights pledges, and campaigns.

Human Respect Program

Program	Description
Human Respect Pledge	All employees (including contract workers) electronically sign an annual pledge on ethics and mutual respect
Human Respect Training	Mandatory online and offline training for all employees · Online mandatory training: prevention of workplace bullying and sexual harassment, and understanding human rights management · Offline training: special Human Respect training; regular training on preventing Human Respect violations across all courses, excluding job/technical courses at the POSCO GROUP UNIVERSITY
Human Respect Campaigns	Issue-specific Human Respect campaigns announced through the internal system (at least six times per year)
On-site Human Respect Counseling	Counseling center operated with external experts to provide tailored counseling for applicants

Human Rights Training for Employees

POSCO group operates a common human rights and diversity training framework across the Group to raise employees' human rights awareness and strengthen diversity and inclusion capabilities. Mandatory statutory training on preventing workplace sexual harassment and bullying and improving disability awareness is provided annually to all regular and contract employees. POSCO group also offers elective programs, including cross-cultural training and Empathy Plus workshops, to broaden diversity, equity, and inclusion (DE&I) capabilities.

Employee Human Rights Training

Category	Program	Target	Method
Mandatory company-wide training	· Prevention of workplace sexual harassment and bullying · Disability awareness improvement · Understanding human rights management	All employees (including contract workers)	Online (mandatory)
Special training	· Special training on preventing workplace sexual harassment	All employees	Offline
Elective training	· Cross-cultural training · Empathy Plus workshops	All employees	Online/ offline
Advanced leadership training	· Understanding human rights and related responsibilities	Managers and organizational leaders	Offline

Measures to Eliminate Child Labor and Forced Labor

POSCO group prohibits child labor and forced labor through its Human Rights Management Declaration and human rights policies, and systematically implements prevention, monitoring, and management measures across all business sites. Beginning in 2026, major Group companies will manage related risks on an ongoing basis through human rights due diligence at overseas business sites. The Group is also strengthening elimination measures across the value chain by recommending that suppliers comply with relevant prohibitions under the Supplier Code of Conduct. In countries where supply chain human rights due diligence laws are in force, POSCO group submits statements required under applicable laws, strictly manages the potential risk of forced labor and child labor, and clearly communicates its commitment to preventing and managing human rights risks.

Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act
Australia's Modern Slavery Act 2018 UK Modern Slavery Act 2015

Career Development for Minorities, Vulnerable Groups, and Women Employees

POSCO group operates career development and capability-building programs so that employees from diverse backgrounds can grow with equal opportunities. Since joining 'Women In' a women's leadership development initiative, in 2024, POSCO E&C has carried out programs to identify women talent, provide leadership training, build internal and external networks, and participate in next-generation women's conferences. As a founding member of the Korea Diversity Council, POSCO E&C is also widening external collaboration to develop women talent. POSCO International supports women employees in strengthening leadership, gaining global experience, and building careers while balancing work and family responsibilities through programs such as W-Mentoring for women managers, expanded selection of women expatriates, and online content subscription support. Through these programs, tailored to the growth stage and career characteristics of women employees, POSCO group supports capability development and broader leadership opportunities for women talent. POSCO group is also expanding employment of persons with disabilities, led by POSCO Humans, Korea's first subsidiary-type standard workplace for persons with disabilities, established in 2007. For employees with disabilities, POSCO group operates recruitment processes tailored to each disability type and continues recruitment activities in cooperation with vocational training institutions and special schools.

Stakeholder Grievance Handling

In line with the requirements of global due diligence legislation, POSCO Holdings has standardized grievance types related to human rights issues and put in place a group-wide integrated grievance mechanism. Based on this framework, POSCO Holdings has set standards and procedures so that major grievances within the Group can be systematically reported, transferred, and supported between POSCO Holdings and its operating companies. The POSCO Holdings Reporting Center also manages reporting channels by grievance type, including safety and illegal subcontracting, ethical misconduct, abuse of power, bullying and sexual harassment, fair trade, and general human rights issues. General human rights issues handled by the ESG Office are received across 10 areas: human rights management systems, non-discrimination in employment, freedom of association, forced labor, child labor, safety, supply chain management, local community rights, environmental rights, and consumer rights. After the ESG function receives the initial report, relevant departments by area conduct investigations and take necessary measures. POSCO Holdings has also established criteria for issues to be handled by operating companies, reported to the holding company, or transferred to the holding company when human rights issues arise, enabling a fairer and more timely response. Grievances reported or transferred to the holding company are used to improve Group-level human rights policies and develop measures to prevent recurrence.

Group-wide Integrated Grievance Mechanism

1. Receipt of Reports

Channels
Online channels (email/website), telephone, mail, or in-person visits

Method
Anonymous or named reporting

Languages
Korean, English, or language of choice

Whistleblower Protection
Whistleblower protection system

2. Classification & Assignment

Classification by Grievance Type

Type	Responsible Department
Safety/illegal subcontracting	Group Safety Innovation Task Force
Ethical misconduct	Corporate Audit Office
Abuse of power	Human Respect Center
Bullying/sexual harassment	Human Respect Center
Fair trade	Legal Affairs
General human rights issues[1)]	(Receipt) ESG, (Investigation) Relevant departments (e.g., HR, procurement, ESG)

3. Reporting & Transfer

Review of reporting and transfer criteria

Handled independently by operating companies
· Minor/general issues

Reported to holding company
· Violations of ILO core conventions
· Infringements of land rights and other usage rights
· Violations of OECD due diligence legislation
· Issues raised by international NGOs
· Other significant issues

Escalated to holding company
· Involvement of top management or senior executives
· Involvement of multiple affiliates
· Structural issues affecting the Group

4. Investigation & Handling

Confirmation of reported details
↓
Fact-finding investigation
↓
Corrective measures for confirmed violations (Disciplinary action where necessary)
↓
Notification of results and feedback on handling status

1) Human rights management systems, non-discrimination in employment, freedom of association, forced labor, child labor, safety, supply chain management, local community rights, environmental rights, and consumer rights

STRATEGY

Strategies and Countermeasures

Remedial Measures for Human Rights Violations

POSCO Holdings operates a step-by-step response process for human rights violations involving employees and other stakeholders, including local residents, covering the entire process from incident identification to follow-up management. For cases such as sexual misconduct, where victim remedy and prevention of secondary harm are required, victim protection takes top priority.

Protection and Remedial Measures

Category	Description
Confidentiality	· All participants in investigations are required to sign confidentiality pledges.
Victim protection measures	· Support provided upon the victim's request - Legal support: designate an in-house attorney for sexual misconduct cases and support the appointment of external counsel when necessary - Medical support: cover medical treatment and related expenses arising from sexual misconduct - Counseling support: provide ongoing professional counseling through the Mind Care Center (Hyu)
Corrective and disciplinary measures	· Implement corrective measures when Human Respect violations are reported and substantiated · Take disciplinary action against perpetrators and implement measures to prevent recurrence
Prevention of secondary harm	· Stipulate victim protection and secondary harm prevention measures in company regulations on workplace bullying and sexual harassment - Strict disciplinary action for concealing workplace bullying or sexual harassment, or causing secondary harm - Stricter disciplinary action when the victim's direct supervisor causes secondary harm
Preventive management	· Mandatory workplace bullying and sexual harassment prevention training for all employees · Pledge on gender equality and mutual respect

RISK MANAGEMENT

Risk Management

Identification and Management of Human Rights Risks

POSCO group operates a human rights risk management system to stay ahead of human rights violations and negative impacts that may arise in the course of business operations. In particular, POSCO group ensures consistency in human rights management by following standardized criteria and procedures under the Group's Guiding Principles for Human Rights Due Diligence.

Human Rights Risk Management Process

Stage	Key Activities
HRIA planning	Pre-screen major human rights risks that may arise across business operations and the supply chain Confirm assessment indicators
Identification of negative human rights impacts	Conduct desk-based and on-site due diligence Identify vulnerable groups Derive key human rights issues
Prioritization	Prioritize identified human rights issues based on severity and likelihood
Preparation of response measures	Implement preventive, mitigation, and improvement measures
Monitoring and reporting	Report quantitative and qualitative indicators and monitoring results

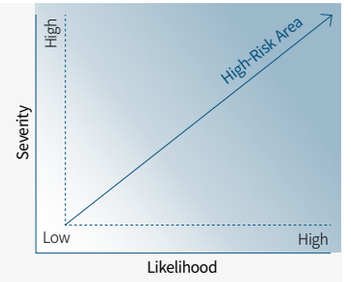
To systematically identify and manage adverse human rights impacts that arise or may arise across its business activities and supply chain, POSCO Holdings considers a broad range of risk factors at the human rights impact identification stage.

Human Rights Risk Factors

Factor	Definition
Company-level risk factors	Factors that increase the likelihood of human rights violations within a company, such as insufficient human rights management policies or governance systems, absent or inadequate grievance procedures, or lack of human rights training
Business operation risk factors	Factors that increase the likelihood of human rights violations in the course of business operations, including business models, grievance filings, or disputes
Geographic risk factors	Factors that increase the likelihood of human rights violations when operating or sourcing in regions with poor social and economic conditions, areas inhabited by Indigenous Peoples, areas where forced labor or child labor occurs, or conflict-affected areas
Sector-specific risk factors	Factors that increase the likelihood of human rights violations due to exposure to high-risk sectors, such as raw material extraction

Desk-based and On-site Due Diligence

Priority Assessment Results



Based on human rights risk factors, POSCO group conducts desk-based and on-site due diligence across its own operations, subsidiaries, and supply chain, and identifies areas where human rights impacts are more likely to occur and could be more severe. For employee due diligence, POSCO group conducts checklist-based self-assessments of its human rights management system across 11 major human rights areas, together with employee human rights awareness surveys. For the supply chain, POSCO group also considers business importance and uses tools such as supplier ESG self-assessment questionnaires. When the analysis identifies reasonable grounds to infer that human rights violations may have occurred, the Group conducts on-site due diligence. During on-site due diligence, POSCO group conducts focus group interviews with vulnerable groups[1] as a priority to more precisely identify and manage high-risk human rights issues.

1) Refers to individuals or groups that may be relatively more exposed to human rights violations arising from business activities, including women, older workers, young workers, non-regular workers, minorities, local residents, and consumers

Results of Desk-based Due Diligence by POSCO Holdings

Overview of Desk-based Due Diligence

Starting in April 2025, POSCO Holdings conducted desk-based HRIA due diligence for domestic employees over approximately five weeks. Desk-based due diligence consists of a human rights management system assessment and an employee awareness survey. The human rights management system assessment comprehensively reviews the Company's overall human rights management activities, including relevant regulations, systems, and training. It is conducted by a Working Group composed of personnel from departments responsible for human rights-related areas, including HR and labor, information security, Corporate Audit, and ESG. The employee awareness survey was conducted among all employees and dispatched workers of POSCO Holdings in Korea. A total of 585 men and 148 women participated.

Results of Desk-based Due Diligence

① Human rights management system assessment	96/100 points
② Employee awareness survey	90/100 points

Gap: Difference between system level and employee awareness based on ① - ②

Awareness gap 6 points

Both the human rights management system assessment and employee awareness survey at POSCO Holdings scored above 90 points on average, which is considered excellent under the Company's internal evaluation criteria. No material human rights risks were identified.

POSCO Holdings will continue monitoring and management activities to identify and prevent potential human rights risks.

Key Employee Comments

- The company protects individual freedom and provides substantial support that allows employees to stay focused on their work
- It is positive that no major human rights-related risks or issues have occurred and that matters are being managed in a stable manner
- A culture of human respect aligned with recent trends in human rights management and organizational culture is spreading within the organization
- A culture that encourages parental leave regardless of gender is gradually taking root, and employees returning from leave are generally assigned to the same or similar roles as before

HRIA Indicators

Area	Indicator		Assessment	Employee Awareness
A. Establishment of a Human Rights Management System	· Declaration of a human rights policy · Regular HRIAs	· Measures needed to institutionalize human rights management · Human rights management performance	32 items	7 items
B. Non-discrimination in Employment	· Non-discrimination in employment · Non-discrimination against non-regular workers	· Establishment of remedial procedures	13 items	6 items
C. Freedom of Association and Collective Bargaining	· Freedom of association and collective bargaining	· Non-discrimination against foreign workers	11 items	2 items
D. Prohibition of Forced Labor	· Prohibition of forced labor	· Prevention of forced labor in subsidiaries and suppliers	9 items	5 items
E. Prohibition of Child Labor	· Prohibition of employment of minors · Prohibition of child employment	· Measures upon employment of minors	10 items	2 items
F. Ensuring Occupational Safety	· Workplace safety · Protection of pregnant workers and persons with disabilities	· Provision of protective equipment and training · Support for workers affected by industrial accidents	15 items	7 items
G. Prevention of Workplace Sexual Harassment and Bullying	· Establishment and maintenance of policies · Assessment and corrective action	· Prevention and education · Monitoring and disclosure	12 items	6 items
H. Responsible Supply Chain Management	· Policies · Prevention of human rights violations by suppliers and other parties · Identification and prevention of human rights risks	· Monitoring and action · Prevention of human rights violations by security personnel · Disclosure and grievance mechanisms	9 items	2 items
I. Protection of Local Residents' Human Rights	· Respect for and upholding the human rights of local residents		6 items	2 items
J. Environmental Rights	· Establishment and maintenance of environmental management systems · Disclosure of environmental information	· Precautionary principle in addressing environmental issues	10 items	3 items
K. Consumer Rights Protection	· Compliance with consumer protection laws	· Actions taken for product defects	9 items	2 items
Total			136 items	44 items

RISK MANAGEMENT

Risk Management

Countermeasures

POSCO group conducts HRIAs not only for the holding company but also for its operating companies. For the supply chain, HRIAs are incorporated into regular supplier due diligence.

The Group operates a systematic response framework to prevent and mitigate human rights risks identified through assessments. To ensure the effectiveness of its measures, it draws on advice from external human rights and labor experts when necessary, and applies a range of management tools in an integrated manner, including upgrades to internal policies and employee awareness training, depending on the nature of the risk.

Supply chain human rights risks are reviewed in stages, from prevention to follow-up management, in connection with the Company's procurement process. At the contracting stage, suppliers are required to submit a Supplier Code of Conduct Compliance Agreement, helping ensure that they understand and participate in the Company's human rights protection standards. At the same time, the Group supports preventive activities, including group training, to help suppliers strengthen their human rights management capabilities. If vulnerabilities are found during due diligence, the Group guides suppliers, as independent business entities, to identify their own improvement plans and take corrective action voluntarily, working together to prevent potential risks from developing into actual human rights violations.

Key countermeasures following the 2025 HRIA results

Operating Company	Target	Key Response Measures in 2025
POSCO INTERNATIONAL	Local communities near overseas business sites (Indigenous Peoples)	Operated community-based programs to preserve Indigenous Peoples' traditional culture and support economic self-reliance
POSCO E&C	Subsidiaries and employees	Supported subsidiaries' HRIAs and conducted human rights management system assessments Conducted a micro-aggression prevention campaign for employees
POSCO FUTURE M	Employees and suppliers	Improved employee access to grievance handling and conducted human rights training Provided environmental consulting for supplier worksites (15 companies)

Communication and Reporting

HRIA results and response measures are shared with the Group Human Rights Management Council, and material human rights risks and improvement outcomes are reported to the ESG Committee and the Board. POSCO group also transparently discloses HRIA results to internal and external stakeholders through its Sustainability Report.

METRICS AND TARGETS

Targets

Phased Advancement of the Human Rights Management System

POSCO Holdings has set phased milestones to further advance its human rights management system and tracks progress against them in a structured manner.

Roadmap for Advancing the Human Rights Management System

Establish the Group Human Rights Management System (2025)

- Proclaimed the Human Rights Management Declaration and established the human rights management system
- Completed HRIAs for seven operating companies participating in the Group Human Rights Management Council
  - : Built the foundation for HRIAs at domestic business sites, completed desk-based and on-site due diligence, and conducted comprehensive analysis

Expand the Group Human Rights Management System (2026)

- Expanded the scope of human rights management
  - : Expanded the number of operating companies with human rights management systems (POSCO FLOW, POSCO M-TECH)
  - : Advanced human rights management systems, human rights due diligence, and remedy measures for overseas business sites
- Improved employees' awareness of human rights management
  - : Domestic employees - Human rights management campaigns
  - : Global staff at overseas business sites - Local-language video training materials on human rights management

Advance the Group Human Rights Management System (2030)

- Operate response system for the CSDDD

POSCO Argentina: Human Rights Management for Employees and Shared Growth with Local Communities

POSCO Argentina is a key overseas business site of POSCO Holdings, developing lithium brine resources in the high-altitude Andes of northwestern Argentina. POSCO Argentina operates lithium extraction projects at salars in Salta and Catamarca provinces. As indigenous communities live near the project sites, the Company respects the rights of Indigenous Peoples and builds cooperative relationships grounded in mutual trust through ongoing engagement with local communities.

Overview of POSCO Argentina

Key business: Development of lithium resources in salars and production of lithium hydroxide/ lithium carbonate

Workforce[1)]**:** 601 in total

- 64 expatriates and 537 local employees, including 57 indigenous workers[2)]

1) As of April 2026
2) Indigenous workers are directly engaged in support, maintenance, quality control, and other operations at high-altitude salt lake

Operation of the ESG Council

Since January 2025, POSCO Argentina has operated a monthly ESG Council, joined by the President of the local entity and representatives of major contractors and suppliers, to promote shared growth with local communities. The Council discusses key issues such as safety, environment, ethics, and human rights, identifies improvement activities, and shares the results. In cooperation with supplier associations in Salta and Catamarca provinces, POSCO Argentina also holds annual briefings on local procurement for member companies.

Human Rights Management Declaration and Human Rights Training

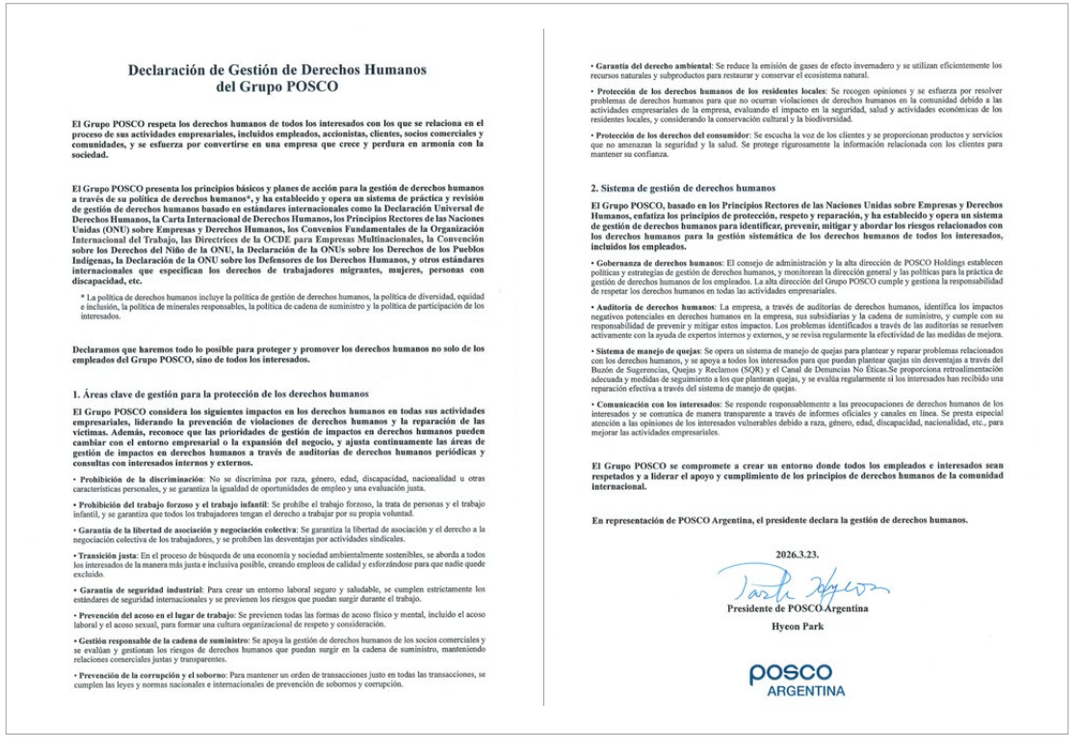
In March 2026, the President of POSCO Argentina personally signed and publicly announced the POSCO group Human Rights Management Declaration, reaffirming the Company's commitment to business operations grounded in respect for human rights.
POSCO Argentina also provided online and offline change management training for expatriates and global staff, using local-language video training materials for global staff. The Guiding Principles for Human Rights Due Diligence and the Grievance Handling Guidelines were posted at business sites, laying a systematic foundation for implementation.

Establishment of Labor and Human Rights Policies

To stay ahead of growing international expectations for sustainable mineral extraction, POSCO Argentina established local labor and human rights policies and, in March 2026, held a presentation session for indigenous communities near its project sites. At the session, POSCO Argentina shared policy details and listened to feedback from community representatives, including eight representatives from Ciénaga La Redonda in Catamarca Province and seven representatives from Santa Rosa de los Pastos Grandes in Salta Province.

Key Elements of the Human Rights Policy

① Prevention of discrimination and ensuring safe working environments based on compliance with international human rights standards and relevant laws and regulations
② Operation of grievance mechanisms and communication channels for workers, suppliers, and local communities
③ Respect for and protection of Indigenous Peoples and vulnerable groups



Declaración de Gestión de Derechos Humanos del Grupo POSCO

El Grupo POSCO respeta los derechos humanos de todos los interesados con los que se relaciona en el proceso de sus actividades empresariales, incluidos empleados, accionistas, clientes, socios comerciales y comunidades, y se esfuerza por convertirse en una empresa que crece y perdura en armonía con la sociedad.

El Grupo POSCO presenta los principios básicos y planes de acción para la gestión de derechos humanos a través de su política de derechos humanos*, y ha establecido y opera un sistema de práctica y revisión de gestión de derechos humanos basado en estándares internacionales como la Declaración Universal de Derechos Humanos, la Carta Internacional de Derechos Humanos, los Principios Rectores de las Naciones Unidas (ONU) sobre Empresas y Derechos Humanos, los Convenios Fundamentales de la Organización Internacional del Trabajo, las Directrices de la OCDE para Empresas Multinacionales, la Convención sobre los Derechos del Niño de la ONU, la Declaración de la ONUs sobre los Derechos de los Pueblos Indígenas, la Declaración de la ONU sobre los Defensores de los Derechos Humanos, y otros estándares internacionales que especifican los derechos de trabajadores migrantes, mujeres, personas con discapacidad, etc.

* La política de derechos humanos incluye la política de gestión de derechos humanos, la política de diversidad, equidad e inclusión, la política de minerales responsables, la política de cadena de suministro y la política de participación de los interesados.

Declaramos que haremos todo lo posible para proteger y promover los derechos humanos no solo de los empleados del Grupo POSCO, sino de todos los interesados.

1. Áreas clave de gestión para la protección de los derechos humanos

El Grupo POSCO considera los siguientes impactos en los derechos humanos en todas sus actividades empresariales, liderando la prevención de violaciones de derechos humanos y la reparación de las víctimas. Además, reconoce que las prioridades de gestión de impactos en derechos humanos pueden cambiar con el entorno empresarial o la expansión del negocio, y ajusta continuamente las áreas de gestión de impactos en derechos humanos a través de auditorías de derechos humanos periódicas y consultas con interesados internos y externos.

- **Prohibición de la discriminación**: No se discrimina por raza, género, edad, discapacidad, nacionalidad u otras características personales, y se garantiza la igualdad de oportunidades de empleo y una evaluación justa.
- **Prohibición del trabajo forzoso y el trabajo infantil**: Se prohíbe el trabajo forzoso, la trata de personas y el trabajo infantil, y se garantiza que todos los trabajadores tengan el derecho a trabajar por su propia voluntad.
- **Garantía de la libertad de asociación y negociación colectiva**: Se garantiza la libertad de asociación y el derecho a la negociación colectiva de los trabajadores, y se prohíben las desventajas por actividades sindicales.
- **Transición justa**: En el proceso de búsqueda de una economía y sociedad ambientalmente sostenibles, se aborda a todos los interesados de la manera más justa e inclusiva posible, creando empleos de calidad y esforzándose para que nadie quede excluido.
- **Garantía de seguridad industrial**: Para crear un entorno laboral seguro y saludable, se cumplen estrictamente los estándares de seguridad internacionales y se previenen los riesgos que puedan surgir durante el trabajo.
- **Prevención del acoso en el lugar de trabajo**: Se previenen todas las formas de acoso físico y mental, incluido el acoso laboral y el acoso sexual, para formar una cultura organizacional de respeto y consideración.
- **Gestión responsable de la cadena de suministro**: Se apoya la gestión de derechos humanos de los socios comerciales y se evalúan y gestionan los riesgos de derechos humanos que puedan surgir en la cadena de suministro, manteniendo relaciones comerciales justas y transparentes.
- **Prevención de la corrupción y el soborno**: Para mantener un orden de transacciones justo en todas las transacciones, se cumplen las leyes y normas nacionales e internacionales de prevención de sobornos y corrupción.
- **Garantía del derecho ambiental**: Se reduce la emisión de gases de efecto invernadero y se utilizan eficientemente los recursos naturales y subproductos para restaurar y conservar el ecosistema natural.
- **Protección de los derechos humanos de los residentes locales**: Se recogen opiniones y se esfuerza por resolver problemas de derechos humanos para que no ocurran violaciones de derechos humanos en la comunidad debido a las actividades empresariales de la empresa, evaluando el impacto en la seguridad, salud y actividades económicas de los residentes locales, y considerando la conservación cultural y la biodiversidad.
- **Protección de los derechos del consumidor**: Se escucha la voz de los clientes y se proporcionan productos y servicios que no amenazan la seguridad y la salud. Se protege rigurosamente la información relacionada con los clientes para mantener su confianza.

2. Sistema de gestión de derechos humanos

El Grupo POSCO, basado en los Principios Rectores de las Naciones Unidas sobre Empresas y Derechos Humanos, enfatiza los principios de protección, respeto y reparación, y ha establecido y opera un sistema de gestión de derechos humanos para identificar, prevenir, mitigar y abordar los riesgos relacionados con los derechos humanos para la gestión sistemática de los derechos humanos de todos los interesados, incluidos los empleados.

- **Gobernanza de derechos humanos**: El consejo de administración y la alta dirección de POSCO Holdings establecen políticas y estrategias de gestión de derechos humanos, y monitorean la dirección general y las políticas para la práctica de gestión de derechos humanos de los empleados. La alta dirección del Grupo POSCO cumple y gestiona la responsabilidad de respetar los derechos humanos en todas las actividades empresariales.
- **Auditoría de derechos humanos**: La empresa, a través de auditorías de derechos humanos, identifica los impactos negativos potenciales en derechos humanos en la empresa, sus subsidiarias y la cadena de suministro, y cumple con su responsabilidad de prevenir y mitigar estos impactos. Los problemas identificados a través de las auditorías se resuelven activamente con la ayuda de expertos internos y externos, y se revisa regularmente la efectividad de las medidas de mejora.
- **Sistema de manejo de quejas**: Se opera un sistema de manejo de quejas para plantear y reparar problemas relacionados con los derechos humanos, y se apoya a todos los interesados para que puedan plantear quejas sin desventajas a través del Buzón de Sugerencias, Quejas y Reclamos (SQR) y el Canal de Denuncias No Éticas.Se proporciona retroalimentación adecuada y medidas de seguimiento a los que plantean quejas, y se evalúa regularmente si los interesados han recibido una reparación efectiva a través del sistema de manejo de quejas.
- **Comunicación con los interesados**: Se responde responsablemente a las preocupaciones de derechos humanos de los interesados y se comunica de manera transparente a través de informes oficiales y canales en línea. Se presta especial atención a las opiniones de los interesados vulnerables debido a raza, género, edad, discapacidad, nacionalidad, etc., para mejorar las actividades empresariales.

El Grupo POSCO se compromete a crear un entorno donde todos los empleados e interesados sean respetados y a liderar el apoyo y cumplimiento de los principios de derechos humanos de la comunidad internacional.

En representación de POSCO Argentina, el presidente declara la gestión de derechos humanos.

2026.3.23.

Presidente de POSCO-Argentina
Hyeon Park

POSCO ARGENTINA

Signed Human Rights Management Declaration by the President of POSCO Argentina

Operation of the ESG Council

Human Rights Training for Employee

Community Engagement and Indigenous Employment

Operation of Free, Prior and Informed Consent (FPIC) Briefing Sessions for Local Communities

POSCO Argentina continues to hold briefing sessions and engagement activities for local communities based on Free, Prior and Informed Consent (FPIC). In early 2026, POSCO Argentina worked with a specialized consulting firm to hold intercultural workshops aligned with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Through two-way communication, the Company also reviewed progress on 10 key commitments. These activities were carried out for communities in Salta and Catamarca provinces, taking into account the characteristics and key issues of each region. The sessions explained major project matters and community impacts, and gathered feedback from local stakeholders.

2026 FPIC Briefing Sessions: Salta Province

Category	Description
Community	Santa Rosa de los Pastos Grandes, SRPG
Overview	Held on Jan. 19, 2026 / 12 participants
Key requests and agreements	· Concern over speeding by contractor vehicles and unclear accountability → Mandatory safe-driving training for employees and contractors · Request for water monitoring → Resident-participatory monitoring once a year and semiannual reporting of results · Request for stronger waste and dust control → Weekly cleanup of surrounding areas and participation in community environmental cleanup activities

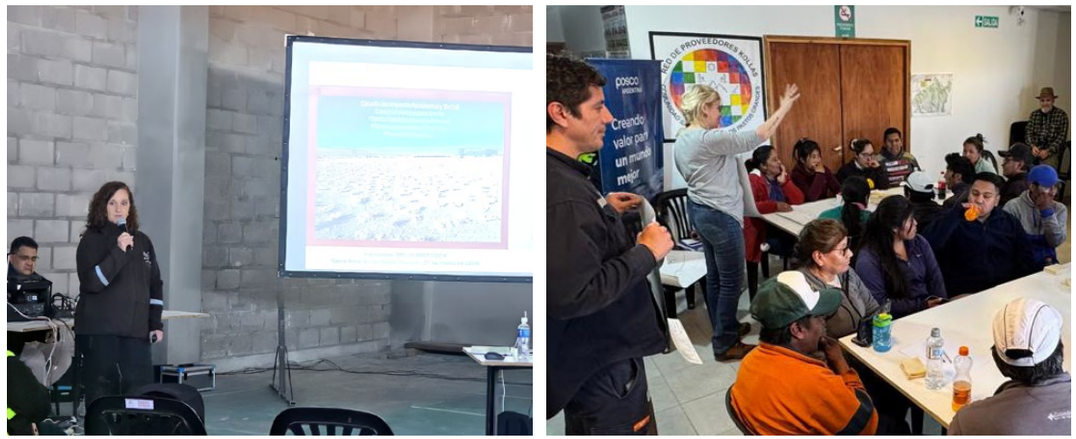
2026 FPIC Briefing Sessions: Catamarca Province

Category	Description
Community	Ciénaga La Redonda
Overview	Held on Jan. 29, 2026 / 35 participants
Key requests and agreements	· Request to respect Indigenous Peoples' right of passage → Official guidance on mining concession boundaries and right-of-passage training for contractors · Expansion of local hiring → Database of unemployed local residents and a target of at least 50% local hiring for new recruitment · Dust from business site roads → Continued internal road maintenance and water spraying

Communication with Local Communities

POSCO Argentina regularly participates in Mesa Social, a community shared-growth council led by the Office of the Undersecretary of Mining under the Ministry of Production and Mining of Salta Province. Mesa Social is an official tripartite consultative body that brings together mining companies operating in the mining area where the project site is located, representatives of local indigenous communities, and the Salta provincial government. It serves as a forum where mining companies operating in the area and local communities discuss shared issues, including infrastructure, employment, the environment, and regional development, and build consensus. Since the first meeting in August 2024, POSCO Argentina has consistently participated in Mesa Social for two communities in Salta Province: Salar de Pocitos and Santa Rosa de los Pastos Grandes (SRPG). At each meeting, POSCO Argentina actively listened to community requests, including disclosure of locally hired personnel lists, drinking water supply, and digital competency training, and shared implementation results.

POSCO Argentina also holds regular briefings to collect opinions and grievances from local residents and receives suggestions on an ongoing basis via QR codes. Suggestions received are reviewed and discussed by the CSR team together with the local community to develop mutually agreed improvement measures. Implementation results and outcomes are disclosed to the community, and additional improvements are reflected in the next business plan.



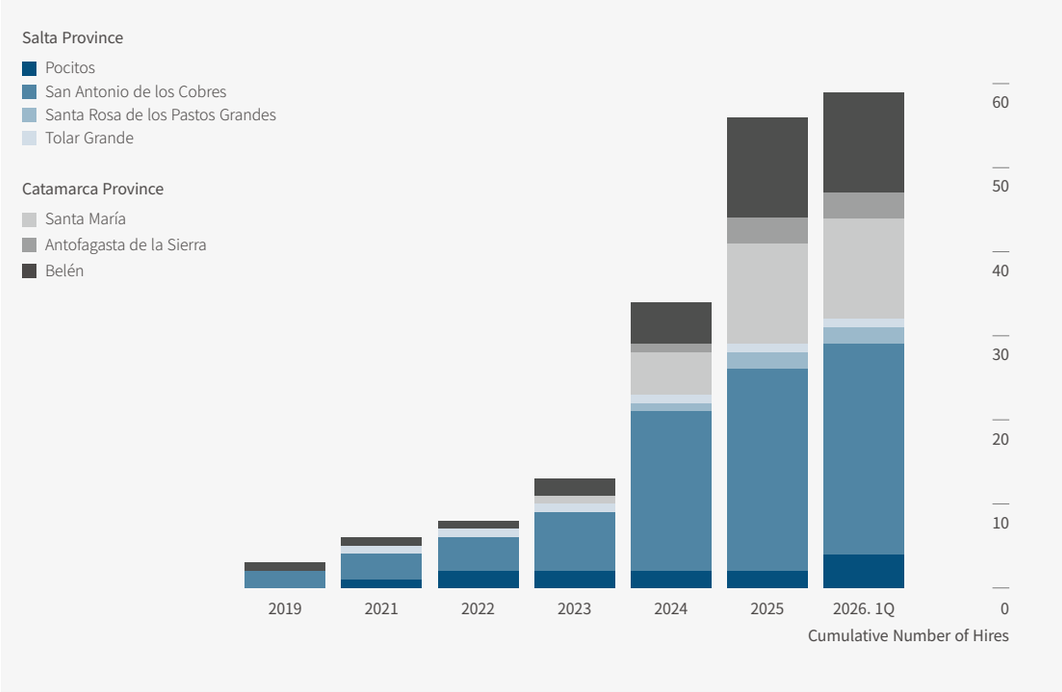
Mesa Social Site

Creating Jobs and Building Capabilities for Indigenous Communities

POSCO Argentina provides ongoing employment opportunities for residents of 7 communities near its lithium salar sites located about 4,000 meters above sea level, putting shared growth with local communities into practice. The company hired 21 new local employees in 2024 and 22 in 2025. As of the first quarter of 2026, a total of 57 local residents were employed, representing 19% of the directly employed workforce at the high-altitude sites. This contributes to stable job creation for local talent.

Local residents hired by POSCO Argentina perform core roles across business operations, including operating lithium salar ponds, wells, and production facilities; maintaining electrical and mechanical plant equipment; supporting geological and topographical surveys; and managing facilities. To promote shared growth with local communities, the Company avoids recruitment focused on low-skilled labor. Instead, it pursues a competency-based hiring policy that helps indigenous workers build professional capabilities, supporting quality job creation and sustainable growth within local communities.

Indigenous Employment Status



Status and Plans for Indigenous Employment and Capacity Development

Category	Status	Future Plans
Recruitment and employment	· Direct employment: 57 employees in total · Workforce structure: Operations-centered workforce, including field operators (50% or more), maintenance (11%), and administrative positions (7%) · Target regions: Major communities in Salta and Catamarca provinces	· Community-specific recruitment: Dedicated process by community to be introduced from May 2026 · Expanded employment opportunities: Secure continuous and legally stable employment by hiring allocated personnel by region
On-the-job training	· Mentoring: Six-month OJT (On-the-Job Training) for new hires and one-on-one dedicated mentors · Training method: Job theory training combined with on-site practice · Reporting system: Weekly learning reports submitted and reviewed by managers	· Conversion to permanent positions: Conversion after six months of training, based on final competency assessment and approval by division heads · Enhanced evaluation: Objective verification and hiring based on job-specific evaluation criteria
Vocational skills training	· Needs survey: Completed survey of on-site competencies required by all operating departments	· Training design: Customized technical training for local talent based on actual production and maintenance needs · Talent pool: Build a stable on-site workforce pipeline by developing local technical talent
Professional internship	· Design stage: Finalized internship program design for university students majoring in engineering and technology · Academic cooperation: Preparing agreements with local universities	· 2026 implementation: Prioritize introduction at plants in Salta and General Güemes, then consider expansion to the Puna region · Value creation: Develop high-level local talent and realize Creating Shared Value (CSV) with local communities

Community Shared Growth Program

POSCO Argentina listens to community feedback through multiple engagement channels, including briefing sessions and QR code-based feedback collection. Feedback received is reflected in the planning of shared-growth programs, while implementation results are shared transparently with the community. The company also reflects outcome analyses in future programs to enhance their effectiveness.

Process for Reflecting Community Feedback

Collection of Community Feedback

Resident suggestions received through briefing sessions and informal communication channels, as well as community activity satisfaction surveys

Incorporation into community shared-growth programs

Review by the CSR team

Program implementation and outcome sharing

Transparent disclosure of results

Outcome Review Meeting

Review outcomes and use feedback to shape future briefing sessions and improvement initiatives

Key Community Shared Growth Activities

Support for Living Infrastructure and Local Culture/Community

Regular drinking water supply (agreement implementation) (Oct. 2025-Mar. 2026):
Water tanks (2 units) and water supply support for the Tolar Chico area and livestock (4 times in 2025: 20,000 L; once in 2026: 10,000 L)

Participation in and sponsorship for the Feria de la Llama (Mar. 2026):
Participated in and sponsored an event for around 200 people; sponsored awards for outstanding livestock farmers (donation of solar panel sets)

Developing Local Talent

POSCO TJ Park Foundation scholarship (Nov. 2025):
20 students from the National University of Catamarca and the Catholic University of Salta (equivalent to USD 60,000)

Lithium hydroxide project plant tour (Oct. 2025):
65 participants, including technical high school students, teachers, and local council members

Downstream plant tour (Dec. 2025):
49 participants, including college/high school students and teachers

Resident Welfare

Free medical care (Feb. 2026):
11 residents in the Torzalito area

Hazardous materials transportation safety training (Dec. 2025):
23 participants from the fire department, police, hospitals, and local governments in the Güemes area

Handmade soap production training (Feb. 2025):
Entrepreneurship-linked course for 40 women and youth in the Torzalito area

PT.BIA: Human Rights Impact Assessment for Employees and Local Communities

Overview of the HRIA

In 2025, POSCO International engaged LRQA, an independent external expert organization, to conduct a third-party Human Rights Impact Assessment (HRIA) for the palm oil plantation in Indonesia operated by its subsidiary, PT Bio Inti Agrindo (PT.BIA). The assessment was conducted to identify the human rights impacts on employees and local communities.

Reference Standards	International Bill of Human Rights, ILO core conventions, United Nations Guiding Principles on Business and Human Rights (UNGPs), and other relevant international standards
Assessment Methodology	Document review, on-site inspection, expert interviews, and local community interviews
Assessment Approach	Issue prioritization based on severity and likelihood · Severity: Scale, scope, and irremediability of adverse impacts · Likelihood: Actual and potential likelihood of occurrence

HRIA Results

The assessment of the 10 key human rights topics identified Indigenous Peoples' and local community rights as the most salient issue, while working conditions and forced labor were identified as salient issues.

Ten Human Rights Issues

- Child labor
- Discrimination
- Forced labor — Salient
- Freedom of association
- Working conditions — Salient
- Safety and health
- Indigenous peoples' and local community rights — Most Salient
- Civil and political rights
- Violence and harassment
- Access to remedy

Human Rights Actions and Effectiveness Review

Based on the findings of the third-party HRIA, PT.BIA established and implemented improvement tasks focused on the three salient human rights issues. These tasks addressed findings identified through document reviews, interviews, and on-site due diligence. In the first half of 2026, PT.BIA conducted a follow-up HRIA designed in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). The follow-up assessment included surveys of PT.BIA employees and employees of plasma cooperatives as well as interviews with Indigenous Peoples, to review the implementation status of key improvement tasks. PT.BIA will continue to advance its improvement activities and monitor the substantive effectiveness of measures taken, thereby further strengthening its human rights risk management.

Actions Taken on Human Rights Issues

Human Rights Issue	Potentially Affected Stakeholders	2025 Assessment Results	2025 Improvement Task Implementation	2026 Follow-up HRIA Results
Indigenous peoples' and local community rights	Indigenous peoples and local communities	• No conflicts related to FPIC[1] or land use identified; potential changes in community culture and living environments due to population inflows and business expansion • Potential long-term social changes, including increased community dependence and changing youth lifestyles; rights-related issues considered significant due to the scale and irremediability of potential impacts • Community engagement and grievance mechanisms require continued strengthening and monitoring	• Regular briefings, stakeholder consultations, grievance handling, and issue sharing through community communication groups and plasma cooperatives • Expanded income-generating programs for Indigenous villages, including rubber latex production and local specialty product development	• Interviews with Indigenous Peoples confirmed positive perceptions of PT.BIA's contribution to local economic stability and living conditions • Cultural conflicts remained limited despite the inflow of external workers following plantation expansion
Working conditions	Employees	• No significant human rights issues related to working conditions identified; improvements needed in working hours and workload management • Further improvements needed in working conditions, including rest breaks and work intensity management; fairness concerns identified due to differences in task difficulty • Further improvements needed in the consistency of operating procedures and workload information sharing, with ongoing monitoring	• Implemented a prior overtime application and approval process and strengthened working hours management • Introduced rest breaks after every four hours of work and job rotation to improve work intensity management • Improved workload management and fairness • Strengthened information sharing with employees, including the disclosure of wage calculation methods	• Rest breaks during overtime and excessive workloads, and consistency in working hours records, remain areas requiring strengthened management and ongoing monitoring
Forced labor		• No significant cases of forced labor under ILO standards identified within the assessment scope; direct employment and written employment contracts in place • Forced labor prevention procedures, including recruitment fee and identity document management, in place; further strengthening needed in pre-employment communication on working conditions and wages • Continued improvement of selected operating procedures and monitoring systems required	• Maintained the principle of direct employment and strengthened employment contract management • Implemented recruitment fee monitoring and reimbursement mechanisms • Strengthened operating standards and monitoring for recruitment and employment management procedures	• No significant cases of forced labor under ILO standards identified within the assessment scope • Pre-employment communication on working conditions and wages operating effectively • Recruitment fee and identity document management procedures operating effectively • Further improvement needed in the consistency of selected operating procedures and monitoring systems

1) FPIC(Free, Prior and Informed Consent)

PT.BIA PT.BIA HRIA Report

POSCO INTERNATIONAL: Human Rights Due Diligence Results for the Shwe Project in Myanmar

Overview of the HRIA

POSCO International conducted a Human Rights Due Diligence (HRDD) for employees and contractors of the Shwe Project in Myanmar to identify and assess human rights impacts that may arise from business activities and operations, and to prevent and mitigate potential human rights risks.

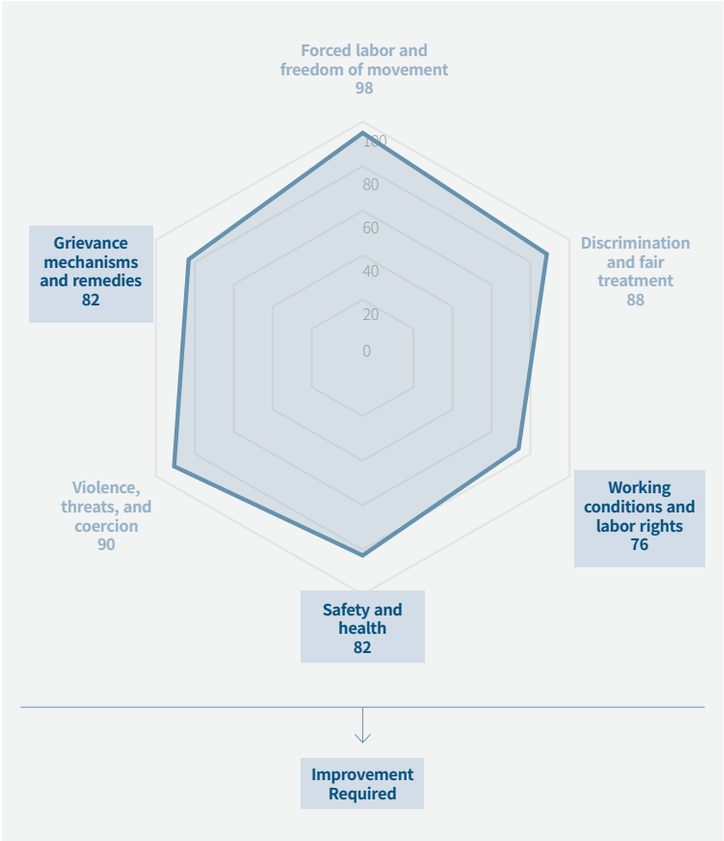
Rather than assessing Myanmar's political or social situation itself, this assessment focused on identifying and managing human rights risks within POSCO International's sphere of influence based on the concept of Direct Linkage under the UNGPs.

The assessment questionnaire was developed in accordance with the UNGPs and refined through prior review and advisory support from the United Nations Global Compact (UNGC) to reflect the characteristics of the project and the local operating environment. Through an employee survey based on international human rights standards, POSCO International reviewed the level of human rights protection and the effectiveness of its human rights management system from the perspective of employees.

HRIA Results and Actions

The HRIA found an overall human rights awareness score of 86.4. Working conditions and labor rights, occupational safety and health, and grievance mechanisms and remedies were identified as areas requiring further improvement. Improvement tasks were developed with a focus on these areas. POSCO International will continue to monitor the implementation of these tasks and conduct regular HRIAs to systematically prevent and mitigate related human rights risks.

Assessment Results by Area



Key Assessment Findings

- No cases were identified in which employees were forced to sign employment contracts or perform work against their will, and the principle of voluntary employment was generally found to be upheld
- No significant human rights issues related to discrimination, harassment, violence, or coercion were identified, and the overall level of awareness was found to be satisfactory
- The assessment identified the need to strengthen communication on key terms and conditions of employment prior to contract signing, as well as training on response procedures for emergency situations
- Employee awareness of official grievance channels, the non-retaliation principle, and handling procedures was relatively low, highlighting the need to improve communication and accessibility of the grievance mechanism.

Actions Taken for Vulnerable Areas

Working conditions and labor rights	• Enhanced new hire training to provide clearer guidance on company rules and key working conditions • Reviewed employment contract management practices by employment type and established a supporting system
Safety and health	• Maintained emergency response procedures and safety training programs • Strengthened workplace safety risk assessments and preventive measures
Grievance mechanisms and remedies	• Provided clearer guidance on official grievance channels and reporting procedures • Raised awareness of the principles of whistleblower protection and confidentiality safeguards

General Topics

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Vicuña at the Hombre Muerto Salt Lake in Argentina

Supply Chain

MANAGEMENT FRAMEWORK

Group Supply Chain Management Council

POSCO group has operated the Group Supply Chain Management Council since 2023. Chaired by the Head of POSCO's Purchasing and Investment Division, the Council brings together purchasing executives from each operating company to discuss supply chain strategies and ways to manage key issues and risks.

※ The Responsible Minerals Council, jointly operated by Group companies since 2020 to manage responsible minerals, has been integrated into the Group Supply Chain Management Council since 2023.

Policy and Guidelines

Supply Chain Policy

POSCO group operates the Supply Chain Sustainability Policy to establish fair trading practices and build a sustainable supply chain grounded in mutual trust with suppliers, including providers of raw materials, equipment, and materials, and contractors, including service providers such as construction companies.

Reflecting international norms such as the UN Guiding Principles on Business and Human Rights and ILO international labor standards, the policy consists of a Supplier Code of Conduct covering nine areas, including human rights, environment, health and safety, anti-corruption, and fair trade. Based on this policy, POSCO Holdings operates a supply chain risk management and due diligence system to systematically assess suppliers' implementation levels. By preventing and mitigating negative impacts, the Company seeks to promote sustainability management across the supply chain and pursue shared growth with stakeholders.

POSCO HOLDINGS Supply Chain Policy → POSCO Supplier Code of Conduct ↗ POSCO FUTURE M Supplier Code of Conduct ↗

Responsible Minerals Policy

POSCO group operates its Responsible Minerals Policy to prohibit the use of conflict minerals and ensure that it uses only responsibly sourced minerals mined in a manner that protects human rights and the environment. The Responsible Minerals Policy covers the 3TGs (tin, tantalum, tungsten, and gold) and cobalt, and incorporates global standards such as the OECD Due Diligence Guidance and the EU Conflict Minerals Regulation. Under this policy, POSCO group operates the OECD five-step due diligence framework, including supply chain risk identification and assessment and smelter due diligence. The policy also requires suppliers to source from smelters certified under the Responsible Minerals Assurance Process (RMAP), building out a responsible sourcing system across the supply chain.

POSCO HOLDINGS Responsible Minerals Policy → POSCO Responsible Minerals Report ↗
POSCO FUTURE M Responsible Minerals Policy ↗

Supply Chain Grievance Mechanism

POSCO Holdings operates a 24-hour reporting channel on its website so that all stakeholders, including suppliers, may report human rights violations or ethical misconduct. Descriptions of the channel are provided in Korean and English, while reports may be filed in other local languages. POSCO Holdings guarantees the confidentiality of whistleblowers and adheres to the principle of ensuring a response to every report received.

MANAGEMENT ACTIVITIES

Supply Chain ESG Due Diligence

In 2023, POSCO established a supply chain ESG due diligence process and has since been building a sustainable supply chain ecosystem by refining its due diligence standards and conducting on-site inspections.

Supply Chain Due Diligence History

- In 2024, revised and distributed the Supplier Code of Conduct to reflect requirements from global customers and rating agencies
- In 2025, advanced the selection of due diligence targets by introducing a risk mapping model based on in-depth industry- and country-specific risk analysis

On-site Due Diligence and Support for Supplier ESG Capacity-building

- Conducted on-site due diligence for domestic suppliers in 2023 and 2024 (50 suppliers each year)
- In 2025, applied a pinpoint targeting approach and conducted on-site due diligence focusing on high-risk overseas suppliers with elevated risk exposure
- Supported suppliers subject to improvement recommendations by providing one-on-one customized solutions through specialized consulting firms, helping strengthen supplier ESG management capabilities

Supply Chain Due Diligence Process

Planning

Target: Raw materials, Equipment & Materials Suppliers
ESG risk identification approach: Operate POSCO's proprietary risk mapping model*
Due diligence methods: Conduct desk-based due diligence using POSCO's purchasing platform (e-Pro) and on-site due diligence for high-risk suppliers through third-party assessment agencies

Desk-based due diligence + **On-site due diligence**

Diagnostic Targets
- Selected from suppliers with transaction records with POSCO → In 2025, a total of 535 suppliers were subject to desk-based due diligence
- On-site due diligence was conducted for two suppliers identified as high ESG risk based on the desk-based due diligence results

Review Items
100 items across five areas, including environment, social, and governance
- Environment: Compliance with permits and licenses; biodiversity; carbon emissions
- Labor and human rights: Forced labor; child labor; whether relevant prohibition standards are in place
- Safety and health: Whether occupational safety and health regulations are in place; whether mandatory safety training is provided
- Ethics: Whether grievance channels are in place; whether training on ethical misconduct is provided

Improvement/monitoring

Improvement Request For supplier ESG risks identified through due diligence, purchasing managers request the relevant suppliers to submit improvement plans and consult with them on implementation
Improvement Implementation Suppliers address ESG risks within 180 days after submitting improvement plans, after which purchasing managers monitor the results of improvement actions

Disclosure

Common Supply chain ESG due diligence results are disclosed through the Sustainability Report, the POSCO website, and other channels
Raw Materials Supply chain information is disclosed for conflict and responsible minerals, including tin, tungsten, nickel, and copper, as well as critical minerals, including aluminum, chromium, manganese, and zinc

* [Industry Risk] Apply global ESG rating agencies' industry ESG risk indices
[Country Risk] Assess environmental and social risks by supplier location
[Business Materiality] Consider factors such as share of purchase amount, supplier type, and industry sector

Shared Growth Programs

Fair Trade and Financial Support

- POSCO E&C transparently manages suppliers' transaction environments through the Shared Growth Cooperation Committee and encourages participation in shared growth through the selection and reward of outstanding suppliers
- Support suppliers' financial stability and reduce their financing burden through the ESG Shared Growth Fund and shared growth loan programs

Talent Development and Venture Support

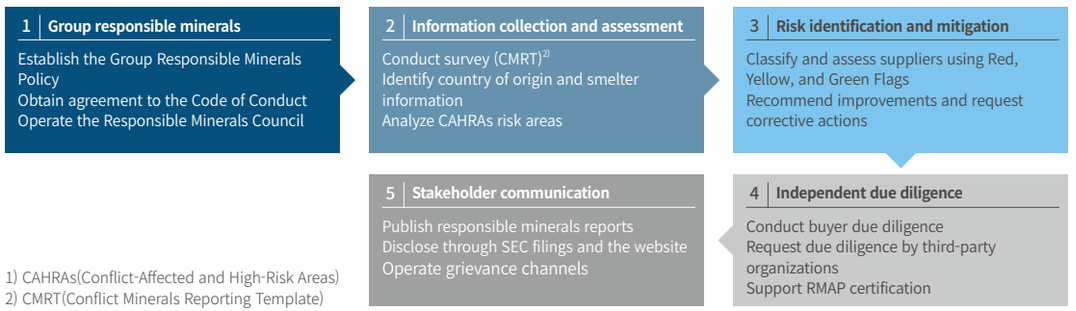
- Operate basic job competency-building programs for Small and Medium-sized Enterprises (SME) employees and young people, with 15,202 participants in in-person training in 2025 and 733,198 cumulative participants (POSCO)
- Systematize training programs, including industry-led vocational education, customized on-the-job training (OJT), and support for young job seekers; support the commercialization of promising ventures and startups through CHANGeUP GROUND and POSCO IM (Idea Market Place)

Health, Safety, and Information Security Areas

- Enhancement of safety management capabilities across the value chain through support for suppliers' compliance with the Serious Accidents Punishment Act, risk assessments, safety training, and safety supplies
- Systematic management of group-wide security risks through standardized security solutions for investee companies, monitoring linked to the Integrated Security Control Center, and on-site information security inspections

Conflict Minerals Risk Assessment

For key minerals such as tin, tantalum, tungsten, and cobalt, POSCO group defines potential human rights violations, links to armed conflict, illegal mining, and ethical issues in conflict-affected and high-risk areas (CAHRAs[1]) as major risk factors. To identify such risks, POSCO group operates a risk identification framework aligned with internationally recognized OECD due diligence guidance and responsible minerals management standards, extending its review to the smelting and refining stages of the supply chain. Potential risks are identified based on exposure to high-risk areas, supply chain structure, and uncertainty over country of origin.


1 Group responsible minerals
Establish the Group Responsible Minerals Policy
Obtain agreement to the Code of Conduct
Operate the Responsible Minerals Council
2 Information collection and assessment
Conduct survey (CMRT)2)
Identify country of origin and smelter information
Analyze CAHRAs risk areas
3 Risk identification and mitigation
Classify and assess suppliers using Red, Yellow, and Green Flags
Recommend improvements and request corrective actions
4 Independent due diligence
Conduct buyer due diligence
Request due diligence by third-party organizations
Support RMAP certification
5 Stakeholder communication
Publish responsible minerals reports
Disclose through SEC filings and the website
Operate grievance channels

1) CAHRAs(Conflict-Affected and High-Risk Areas)
2) CMRT(Conflict Minerals Reporting Template)

Supplier Relationship Management (SRM)

POSCO operates a systematic ESG risk management process across all stages, from supplier registration to performance assessment of contract execution and follow-up management.

Registration of New Suppliers

- Keep supplier registration criteria for each sourcing group available on MyPOSCO year-round, and require applicants to agree to the Supplier Code of Conduct and Special Ethics Terms and Conditions.
- Suppliers undergo a verification process for: (i) non-compliance with environmental laws; (ii) engagement in serious accidents; and/or (iii) cases of delayed wage or tax payments. Afterward, they are screened for basic qualifications such as credit ratings and financial/supply capacity. On-site visits and quality tests are also performed when necessary.

Performance Assessment and ESG Integration

- Conduct semiannual and annual supplier performance assessments for all suppliers with transaction records, classify results into five grades, and apply differentiated management by grade.
- Directly link suppliers' ESG management levels to supplier performance assessments by reflecting deductions for safety incidents and human rights violations.
- ESG due diligence has been performed since 2023 to identify and improve supply chain ESG risks, including environmental and human rights risks.

Follow-up Management and Risk Response Strategies

- Semiannual and annual SRM reports are made available for suppliers, including feedback on their strengths and weaknesses. Excellent-rated suppliers are given preferential treatment options, such as opportunities to be nominated as POSCO Honored Partner, priority negotiation rights, and a waiver of contractual deposit payments.
- Encourage suppliers rated Poor or Weak to make voluntary improvements; if progress remains insufficient, restrict participation in bids for at least three months and up to one year.
- Continuously assess ESG risks (e.g., ethical misconduct and safety incidents) and supply risks (e.g., changes in credit ratings and bidding participation records), and take follow-up measures.

Follow-up Measures

- Where ESG issues, such as environmental or safety concerns, are identified through monitoring of registered suppliers, POSCO issues improvement recommendations and reviews possible sanctions if corrective actions are not taken.

Environmental Management

MANAGEMENT FRAMEWORK

Dedicated Environmental Management Organizations

To strengthen expertise and execution capabilities in managing environmental impacts, POSCO group operates dedicated environmental management organizations at its major operating companies. Each company appoints an executive responsible for environmental management and has headquarters-level planning and policy response teams, as well as on-site environmental management organizations. Key issues are regularly reported to management and the Board.

Establishment and Operation of Environmental Management System

Major business sites operate environmental management systems based on ISO 14001. Their adequacy and operating standards are reviewed through internal audits, as well as follow-up and recertification audits by external certification bodies. Audit results are reported to top management and feed into the development of environmental strategies and targets.

Environmental Law Compliance System

Each operating company monitors legislative and regulatory developments under key environmental laws, including the Clean Air Conservation Act, the Water Environment Conservation Act, the Waste Control Act, and the Chemical Substances Control Act. Material issues are consolidated and managed at the Group level before being reported to the ESG Committee. Water intake is monitored in real time through the Manufacturing Execution System (MES), wastewater is discharged in accordance with strengthened internal standards, and the full waste management process is tracked through the Korea Environment Corporation's Allbaro System.

Participation in Initiatives

POSCO has participated in the CDP Water Security program since 2016 and received a Management B rating in the 2025 assessment. POSCO has also signed an MOU with the Ministry of Climate, Energy and Environment to help address water crises and participates in the Water Positive Council.

MANAGEMENT ACTIVITIES

Air Quality

Investment in Air Pollutant Emissions Control Facilities

POSCO group manages air pollutant emissions under internal standards stricter than statutory limits. Each operating company operates reduction facilities and systems suited to its industry characteristics. Core sites implement mid- to long-term reduction targets, while other sites are managed through regular monitoring.

[Steel]

In accordance with the Special Act on the Improvement of Air Quality in Air Control Zones, POSCO controls its total emissions and is stepping up investments in reduction facilities at major emission sources.

Category	Details
Total emission cap management	· Annual management of total emissions under the Special Act on the Improvement of Air Quality in Air Control Zones, with ongoing investment in air pollution reduction facilities
Dust-collecting bleeders	· Dust-collecting bleeders installed on 100% of blast furnaces at Pohang and Gwangyang Works
Desulfurization and denitrification facilities	· SOx removal facilities (sodium bicarbonate, activated carbon) at sintering plants, plus denitrification facilities using SCR[1]/SNCR[2] and over 1,500 dust collectors installed
Remote monitoring (TMS)	· A cumulative total of 316 real-time Tele-Monitoring Systems (TMS) installed and in operation

1) SCR(Selective Catalytic Reduction) 2) SNCR(Selective Non-Catalytic Reduction)

CASE STUDY

Gwangyang Bay Area Air Quality Improvement Mutual Growth Agreement with Large Enterprises and SMEs

- In 2025, POSCO Gwangyang Works signed a shared growth agreement with Gwangyang City, the Yeongsan River Basin Environmental Office, and four partner companies to improve air quality in the Gwangyang Bay Area
- As the Ministry of Environment's first pilot project, it shares POSCO's environmental management know-how with the local community
- The project costs approximately KRW 850 million, including KRW 420 million from Gwangyang Works, and is expected to improve local air quality

[Infrastructure]

POSCO group manages emission concentrations proactively, tailoring its approach to the operating characteristics of its LNG and construction businesses, while strengthening transparency through air quality disclosures.

Category	Details
POSCO INTERNATIONAL	· Emission concentrations from two auxiliary boilers at the Incheon LNG facility managed to below 20% of the integrated environmental permit standard through facility improvements
POSCO E&C	· Developed and deployed dust suppressants on-site · Disclosed real-time fine dust concentrations on outdoor display boards

[Rechargeable Battery Materials]

POSCO group manages its operations under internal standards that go beyond legal requirements, while earning external recognition for its work in developing resource-circulation materials.

Category	Details
Internal management standards	· Operated a rapid air pollution response process and applied internal management standards stricter than legal requirements
Development of resource-circulation materials	· Received the Minister of Environment's Commendation in Jan. 2025 for developing magnesium hydroxide for water and air pollution treatment

MANAGEMENT ACTIVITIES

Water

Water Conservation, Reuse and Recycling

POSCO group reduces reliance on new water withdrawals by securing alternative water sources and upgrading process water reuse technologies, while expanding reuse practices at sites exposed to high water stress.

[Steel]

Steelmaking processes require large volumes of water for cooling and cleaning, making the reuse of effluent and rainwater a critical lever for reducing water withdrawal and easing pressure on local watersheds. POSCO has developed and applied reverse osmosis (RO) technology to treat relatively clean effluent and recycle it as industrial water, achieving a wastewater reuse rate of 20% as of 2025.

Category	Details
Effluent reuse	· Effluent treated via reverse osmosis (RO) and reused as industrial water; 20% of wastewater reused as of 2025
Rainwater utilization	· Cooling water, rainwater, and road runoff collected and reused through stormwater treatment facilities

[Rechargeable Battery Materials]

As rapid capacity expansion in the rechargeable battery materials business drives up water demand, efficiency gains through process-water recirculation are critical to minimizing additional water withdrawals. POSCO Future M reduces water use by recirculating process water back into production and is co-developing wastewater recycling technologies with external expert organizations.

Category	Details
Process water reuse	· Approximately 140,000 tons of industrial water saved annually by reusing refractory process water
Recycling system	· Introduced a system to recover and recycle filter-press washing water, jointly developed with an external organization

Waste

Waste and Resource Circulation

POSCO group continues to keep recycling rates consistently high while scaling resource circulation models that create marketable products and revenue from by-products.

[Steel]

As steelmaking by-products can be repurposed as valuable resources for construction, cement and agriculture, improving recycling rates helps reduce landfill pressure and generate new revenue opportunities. POSCO maintains a recycling rate of over 98% through by-product resource recovery and is broadening the application of granulated blast furnace slag, a major by-product, from its traditional use as a cement raw material to a wider range of industries, including ecological restoration.

CASE STUDY

Gwangyang Works Creates a Marine Forest in Gwangyang Bay

· Gwangyang Works and the Research Institute of Industrial Science & Technology (RIST) are pursuing marine ecosystem restoration by creating a marine forest
· Marine fertilizer made with slag* is applied to promote the growth of eelgrass

* A slag-based material that supplies iron in Fe ion form to support the habitat development of seaweed and marine plants

[Rechargeable Battery Materials]

POSCO Future M achieved a recycling rate of 99.4% in 2025 and generated KRW 5.0 billion in sales revenue by recycling by-products as cement additives and soil conditioners.

Hazardous Chemicals

Hazardous Chemicals Management System and Chemical Accident Prevention

POSCO group goes beyond legal compliance by operating its own internal standards and accident prevention systems, and proactively manages risks through the substitution of hazardous substances and the development of safer alternatives.

[Steel]

Chemicals management is directly tied to workplace safety, while global regulations increasingly shape product competitiveness. POSCO has strengthened its internal management thresholds to 50% of statutory exposure limits to prevent accidents, and POSCO Steeleon is pursuing regulatory readiness and market expansion through the development of steel sheets with lower hazardous-substance content.

Category	Details
Strengthened management standards	Tightened internal management standards to 50% of the statutory exposure limits
Transition to sustainable products	Commercialized PVC-Sol-replacing urethane color-coated steel sheets (Cr-free) and Recycle-Bio steel sheets

[Rechargeable Battery Materials]

Given the high share of the rechargeable battery materials business in global markets, proactive response to overseas regulations such as EU REACH is a prerequisite for export competitiveness. POSCO Future M analyzes and manages hazardous substances in its products in accordance with EU REACH standards, taking a proactive approach to global regulatory risks.

[Infrastructure]

POSCO International conducted a comprehensive review of major hazardous chemicals, including hydrochloric acid and caustic soda, used at the Incheon LNG Combined Cycle Power Plant and identified reduction opportunities. Based on the review, the Company plans to assess potential substitutes and pursue a phased transition to less hazardous substances.

Talent Development

MANAGEMENT FRAMEWORK

Dedicated Organizations

POSCO Holdings oversees talent development through the Corporate Management Division, which reports to the Representative Director. The Head of the Corporate Management Division holds overall responsibility for talent development and management across POSCO group, reviewing and approving key matters and making related decisions. The Division is organized into units responsible for organizational culture, executive HR, and employee HR, with each unit staffed by professionals with extensive HR management experience across the Group. Key talent management matters, including talent development and training, performance and compensation systems, labor-management relations, and employee health and safety, are reported to management as they arise and incorporated into decision-making.

Compliance with International Labor Standards

POSCO Holdings recognizes that a stable work environment and ongoing employee capability development are essential to the Company's medium- to long-term competitiveness and sustainable growth. To this end, POSCO Holdings operates work environment and talent development systems in compliance with global labor standards and Korean labor laws, and supports the following major international human rights standards.

- ILO(International Labour Organization)
  (ILO Declaration on Fundamental Principles and Rights at Work and Fundamental Conventions)
- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

Working Hours Management Policy

POSCO Holdings recognizes employee health and work-life balance as fundamental to sustainable business operations. In line with ILO standards and the Korean Labor Standards Act, POSCO Holdings has codified working-hour requirements in its Rules of Employment and manages them systematically. The company ensures standard working hours of eight hours per day and 40 hours per week, along with statutory rest periods, and maintains provisions supporting flexible work arrangements, including reduced working hours for childcare and family care.

Wages and Compensation

POSCO Holdings adheres to the principle of paying all employees at least the statutory minimum wage and strictly complies with applicable laws. By reviewing domestic and global living-wage systems and social discussions, POSCO Holdings continuously assesses the adequacy of its compensation system to help reduce income gaps and enable employees and their families to lead dignified lives on income earned within standard working hours alone. Wages and compensation are managed systematically through internal regulations, including the Payroll Regulations, Performance Bonus Payment Guidelines, and Reward and Disciplinary Guidelines. POSCO Holdings also maintains a fair wage system so that employees with the same experience and performance receive equal compensation regardless of gender.

Operation of the Labor-Management Council

Given its nature as a holding company, POSCO Holdings' workforce mainly consists of managerial staff, and the Company does not have a separate labor union. Instead, POSCO Holdings operates a Labor-Management Council with equal employee-management representation, in accordance with the Act on the Promotion of Employees' Participation and Cooperation and its Labor-Management Council Operating Regulations. Employee representatives elected through a company-wide vote participate in the Council, which has met quarterly since its launch in April 2022 to discuss key matters such as grievances, wages, benefits, and working conditions. In principle, Council outcomes apply to all eligible employees in a manner equivalent to a collective agreement, allowing the Council to serve as a practical channel for representing employees' collective views.

Fair Talent Recruitment and HR Operations

POSCO Holdings places fairness at the core of HR processes, including recruitment, performance evaluation, and promotion. In recruitment, the Company uses structured interviews and evaluation criteria to select candidates solely based on job-related competencies and alignment with its organizational culture and talent standards, regardless of gender, age, or background. During performance evaluations, all evaluators and evaluatees sign a Fair Evaluation Pledge. POSCO Holdings also provides regular training on evaluation criteria and methods to help leaders conduct evaluations objectively and fairly, and monitors the process afterward to ensure fairness. For promotions, POSCO Holdings posts promotion guidelines one year in advance, setting out minimum eligibility requirements and bonus criteria so employees can prepare in advance and the process can be operated transparently. HR management standards and procedures are codified in the Company's HR Regulations and made available to employees.

Regular Performance Evaluations

POSCO Holdings conducts semiannual performance evaluations and interim feedback for all employees and links the results to career development. An absolute rating system is applied to objectively assess individual performance and encourage collaboration. The company also strengthens work engagement and performance management through a goal-based system that aligns departmental execution plans with individual goals. Performance management interviews are mandatory in the evaluation process. To review managers' leadership and work styles, POSCO Holdings conducts 360-degree assessments. Depending on the nature of work, it also applies a matrix evaluation method that partially reflects feedback from collaborating departments, in addition to input from the primary evaluator within the employee's department. Evaluation results serve as key inputs for preparing Individual Development Plans (IDPs) and conducting career development interviews. They lead to specific development tasks, such as identifying employees' strengths and areas for improvement, determining required competencies, and assessing readiness for job transfers and promotions. Based on this process, POSCO Holdings designs customized growth activities, including education and training and broader job experience, to support employees' continuous growth and career development.

HR Development Programs

Talent Development Programs

POSCO group provides training through POSCO GROUP UNIVERSITY to develop talent capable of leading group-wide growth and innovation. Through the group-wide Learning eXperience Platform (LXP), all employees, regardless of whether they are regular or contract workers, can participate in career development and competency-building programs. To strengthen the leadership capabilities required at each level, POSCO group operates career stage-based leadership programs for employees ranging from new hires and junior staff to managers and executives. New hires and junior staff receive training that builds their growth vision and role awareness, while managers receive field-oriented practical training to strengthen organizational management capabilities. Programs for key talent and executives focus on business understanding and strategic thinking.

List of Talent Development Programs

Category	Details
Operation of the Group Learning Experience Platform (LXP)	Through the group-wide LXP, all employees—regardless of regular or contract status—are supported in participating in career development and competency-enhancement training.
Career-stage leadership programs	New hires and junior staff are provided with growth vision enhancement and role awareness programs, managers with field-oriented organizational management training, and key talent and executives with programs for enhancing business understanding and strategic thinking.
Future leader succession programs	Candidate groups, including prospective plant managers and department heads, receive systematic development programs, while the future business leader course (Lv. 1–4) is intended for next-generation leaders.
Special company-wide in-person training	All POSCO Holdings employees (incl. dispatched employees) receive this training at least once per month through the P-class system introduced in 2022, strengthening the Group's strategy formulation and execution capabilities.
Programs tailored to contract workers and interns	AI utilization and company-orientation training for newly appointed secretaries, and operation of 'POSCO Steel Bridge,' a recruitment-linked field internship program for university students.

Planning and Evaluation of Training Programs

To enhance training effectiveness, POSCO group conducts systematic evaluations across all programs. Stage-specific metrics, including learner feedback, learning outcomes, and workplace application, are standardized and managed quantitatively, while qualitative outcomes such as contribution to Group strategy and performance on workplace assignments are also assessed. Employee surveys and data analysis are conducted in tandem to support continuous program improvement.

Job Competency Development Programs

To keep pace with changes in the business environment, POSCO group operates a wide range of job competency development programs, including support for employees pursuing degrees and certifications, AI and digital capability programs, and talent development initiatives for overseas subsidiaries.

List of Job Competency Development Programs

Category	Details
Support for degree and certification programs	Employees are provided with various degree programs through in-house recruitment, including MBA programs in Korea and abroad, master's and doctoral programs at POSTECH, job-related master's programs, overseas research, and domestic bachelor's degree transfer programs. They are also given opportunities to obtain professional certifications, including master craftsman, engineer, and industrial engineer certifications.
AI digital competency training	Employees build AI literacy through work transformation (WX) training systems and hands-on programs like basic WX, AI Agents, AI specialists, project-based learning (PBL), and data analysis, as well as through the Group's AI competition, WX Hackathon.
Overseas subsidiary talent development (Global P.A.L.)	POSCO group operates the Global P.A.L.[1] Program for top talent at overseas subsidiaries worldwide, with 102 high-performing employees from 14 countries—including Indonesia, Vietnam, India, Mexico, and Malaysia—participating (2025).
College diploma program	This program is designed to support employees across 13 POSCO group companies who aspire to become key field leaders, including POSCO, POSCO Future M, and POSCO Steeleon (a total of 435 employees completed the program from 2014 to 2025).

1) P.A.L. stands for Pride (pride as outstanding talent), Appreciation (appreciation for exemplary dedication to POSCO group), and Loyalty (sense of belonging as a member of POSCO group).

Retirement Support Programs

POSCO group supports employment stability before and after retirement by offering DB/DC selectable retirement pension plans, reemployment for employees reaching the retirement age, and career transition training.

Support for Reemployment and Retirement Transition

- POSCO operates annual reemployment programs for production technology employees reaching retirement age based on labor-management agreements. It also provides reemployed workers with equal welfare benefits to support transfer of technology and know-how and support the growth of employees.
- POSCO operates three-stage training programs for employees approaching retirement and retirees, covering career planning, couples workshops, and execution capability enhancement, along with career transition programs linked to specialized institutions in financial planning, entrepreneurship, reemployment, farming, rural relocation, and leisure activities.

MANAGEMENT ACTIVITIES

HR Development Programs

POSCO group provides tailored training centered on POSCO GROUP UNIVERSITY, based on education roadmaps designed by job function and career stage. The organizational chart of POSCO GROUP UNIVERSITY and the status of its major training programs are outlined below.

POSCO GROUP UNIVERSITY Organization Chart

POSCO GROUP UNIVERSITY
(Head: Senior Executive Vice President)

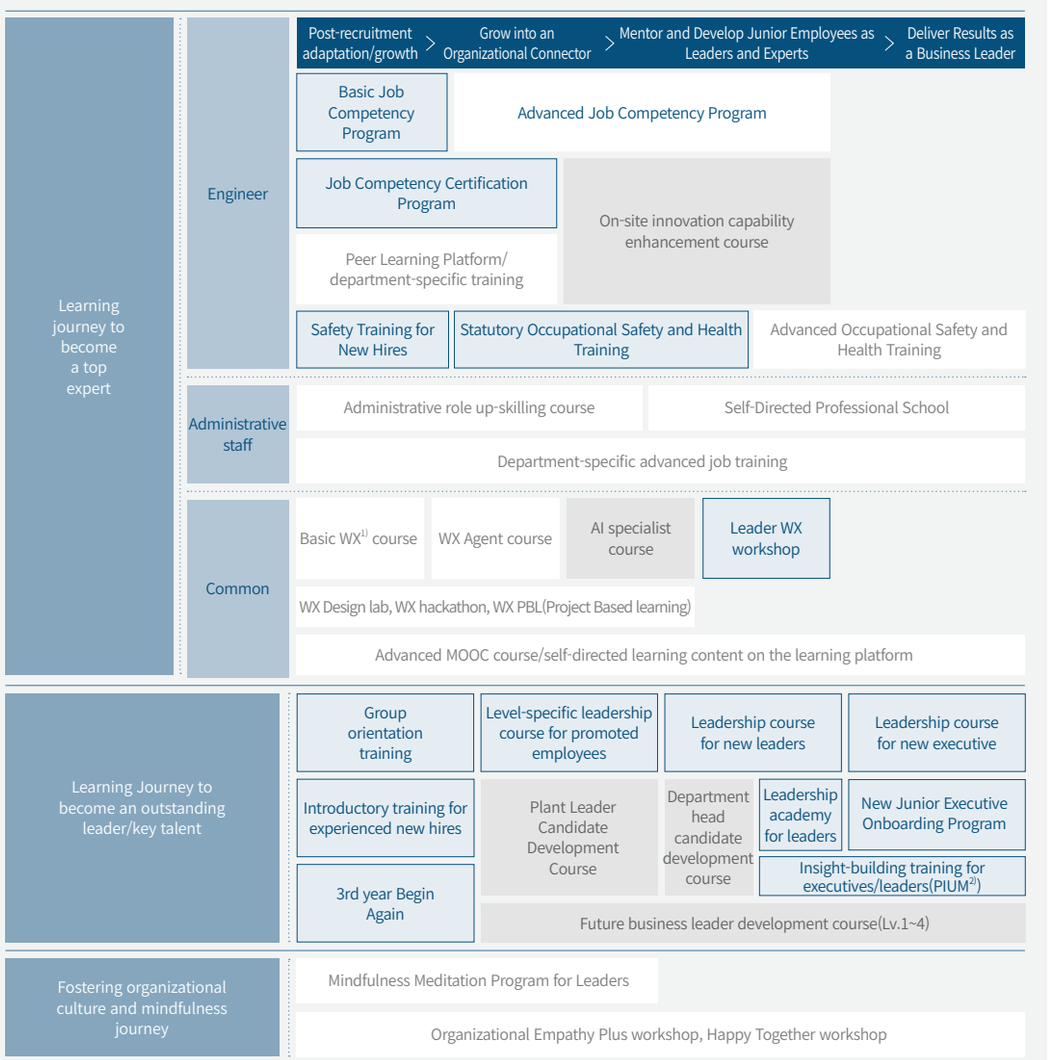
Global Leadership Center (GLC)	Innovation & Technology Center (ITC)
HRD Planning Group- Develop HRD research strategies and support management	Safety Academy- Enhance occupational safety and health capabilities and nurture innovation specialists
Leadership Development Group- Cultivate level-specific leadership from new hires to executives	Digital Skill Development Group- Build AI utilization capabilities and support workflow innovation
Global Employee Development Group- Nurture global staff and operate learning platforms	Technical Skill Training Group- Reinforce employees' job competencies in technical and rechargeable battery fields
Organizational Culture Development Group- Foster organizational culture and nurture on-site leaders/staff	SME Consortium Office- Strengthen capabilities across Group companies (incl. affiliates)

Key Training Outcomes

Topic	Training Course (Area)	Target	Number of completions*
Safety	① Safety laws/regulations and others	All employees (incl. contract workers) from relevant departments	17,472
	② Support for acquiring safety certifications	All interested employees (incl. contract workers)	667
	③ Mandatory safety training	Mandatory for all employees (incl. contract workers)	35,414
Environment	④ Environmental data and Net Zero	All employees (incl. contract workers) from relevant departments	5,288
Ethics	⑤ Understanding Ethical Management	Mandatory for all employees (incl. contract workers)	64,535
Information security	⑥ Understanding and practicing information security	Mandatory for all employees (incl. contract workers)	44,879
Human rights	⑦ Prevention of workplace bullying and sexual harassment	Mandatory for all employees (incl. contract workers)	44,107
	⑧ Disability awareness improvement	Mandatory for all employees (incl. contract workers)	43,897
Anti-corruption	⑨ ICFR	All employees (incl. contract workers) from relevant departments	3,769
	⑩ Fair trade	All employees (incl. contract workers) from relevant departments	7,081
Diversity	⑪ Cross-cultural training, etc.	e-learning: All interested employees (incl. contract workers)	465
		Training for Expatriates and Global Staff: All interested employees (incl. contract workers)	801
	⑫ Empathy Plus workshops	All employees (incl. contract workers) from interested organizations	2,221

* Including duplicates

Management Engineer Training Roadmap


Mandatory
Selected
Elective
Learning journey to become a top expert
Engineer
Post-recruitment adaptation/growth
Grow into an Organizational Connector
Mentor and Develop Junior Employees as Leaders and Experts
Deliver Results as a Business Leader
Basic Job Competency Program
Advanced Job Competency Program
Job Competency Certification Program
On-site innovation capability enhancement course
Peer Learning Platform/ department-specific training
Safety Training for New Hires
Statutory Occupational Safety and Health Training
Advanced Occupational Safety and Health Training
Administrative staff
Administrative role up-skilling course
Self-Directed Professional School
Department-specific advanced job training
Common
Basic WX1) course
WX Agent course
AI specialist course
Leader WX workshop
WX Design lab, WX hackathon, WX PBL(Project Based learning)
Advanced MOOC course/self-directed learning content on the learning platform
Learning Journey to become an outstanding leader/key talent
Group orientation training
Level-specific leadership course for promoted employees
Leadership course for new leaders
Leadership course for new executive
Introductory training for experienced new hires
Plant Leader Candidate Development Course
Department head candidate development course
Leadership academy for leaders
New Junior Executive Onboarding Program
Insight-building training for executives/leaders(PIUM2)
3rd year Begin Again
Future business leader development course(Lv.1~4)
Fostering organizational culture and mindfulness journey
Mindfulness Meditation Program for Leaders
Organizational Empathy Plus workshop, Happy Together workshop

1) WX: Work Transformation, a term defined by POSCO to refer to the full-scale transformation of business and ways of working based on AI
2) POSCO Insight Forum

Working Environment and Employee Benefits

Flexible Work and Work-life Balance

POSCO Holdings continues to expand work options in line with diversifying job characteristics and lifestyles, creating a flexible and efficient working environment tailored to employees' needs and job requirements.

Flexible Work Arrangements by Type

Category	Program	Description
Flexible working hours	Selective working hours	Employees may determine weekly working days and working hours within an average of 40 hours per week (based on a one-month period).
	Biweekly four-day workweek	Employees who have worked an additional hour between Monday and Thursday may take every other Friday off (based on a two-week period).
	Working hours savings system	Accumulated overtime hours can be used as leave.
	Part-time work	Employees may select weekly working hours between 18 and 36 hours (for pregnant employees and employees in childrearing periods).
Flexible work locations	Remote work	Employees can work from home.
	Satellite offices	Employees may use satellite offices in Yeouido, Pangyo, Songdo, and other locations.

Lifestyle Support

- Operate comprehensive benefits covering housing, transportation, leisure, health, and family events
- Apply key programs, including the Employee Stock Ownership Plan (ESOP), flexible working hours, and support for family events, equally to all employees, including contract workers

Family-friendly Programs

- Operate family-friendly welfare programs across the entire life cycle, including marriage, pregnancy, childbirth, childcare, and family care; 16 POSCO group companies[1)] have received Family-friendly Company Certification from the Ministry of Gender Equality and Family

1) POSCO, POSCO International, POSCO E&C, POSCO Future M, POSCO DX, POSCO Flow, POSCO Steeleon, POSCO Mobility Solution, POSCO M-Tech, POSCO Wide, POSCO MC Materials, POSCO A&C, eNtoB, POSCO Humans, POSCO Research Institute, and POSCO GY Solution

Key Family-friendly Programs

Marriage	Pregnancy	Childbirth	Childrearing	Family Care
· Marriage congratulatory bonus · Paid marriage leave · Honeymoon subsidy · Wedding venue rental support	· Fertility support program, including leave, leave of absence, treatment cost support, and remote work · Paid prenatal check-up leave · Reduced/selective working hours and remote work during pregnancy · Paid miscarriage/stillbirth leave	· Maternity leave before and after childbirth (100 days*) · Spousal childbirth leave (20 days*) · Childbirth incentive, adoption subsidy, and newborn welcome gift · Remote work to support a spouse's childbirth	· Childcare focus period · Workplace daycare center · Reduced working hours during childrearing, up to 3 years · Selective working hours during childrearing · Remote work during childrearing, up to 2 years · Selective working hours system · Biweekly 4 day workweek for pregnancy/ childrearing support · Children's scholarships and preferential housing loans for employees with multiple children	· Reduced working hours for family care (15 to less than 30 hours per week, within 1 year)

* Exceed statutory requirements

Employee Well-being and Mental Health Programs

Counseling and Psychological Support

- Provide on-site individual counseling, group counseling, psychological assessments, and training on job stress and interpersonal relationships
- Provide counseling and treatment in connection with external specialized medical institutions, support ongoing mental health checks through online psychological assessments, and provide one-on-one counseling by professional counselors.

Mindfulness and Meditation Programs

- Operate mindfulness programs to support stress management, self-understanding, and emotional regulation

Organizational Culture and Diversity

Fostering Organizational Culture

CEO Field Communication

- After the 100-day "CEO Field Companion" following the CEO's 2024 inauguration, POSCO group ran "Closer Field Companion" in 2025, with site visits and communication sessions once or twice a month for seven months.
- In 2025, communication activities included a special meal with the CEO and employees' families in May and a safety talk with about 70 employees in August, with 37 site visits made in total

Organizational Health Surveys

- POSCO group conducts annual organizational health surveys for employees at each operating company
- Covers areas such as career development, learning opportunities, DEIB[2)], and perceptions of organizational operations

2) DEIB(Diversity·Equity·Inclusion·Belonging)

Executive Leadership Manifesto

- In 2025, Selected organizational culture improvement as a company-wide task based on expert advice and internal diagnostics
- Conducted 10 sessions of the "Workstyle Innovation Workshop" with the participation of more than 200 executives and published the Executive Leadership Manifesto, which contains 14 action guidelines

Fostering Diversity

POSCO group promotes diversity by expanding opportunities for women, persons with disabilities, and local overseas employees. POSCO Holdings raised the share of female executives and managers from 2.6% in 2023 to 3.9% in 2025.

- Established in 2007 as Korea's first subsidiary-type standard workplace for persons with disabilities, POSCO Humans supports disabled athletes and artists and received the Iron Tower Order of Industrial Service Merit in 2023
- Prohibits gender discrimination under the Rules of Employment and prevents gender-based pay gaps through job-based pay
- Operates POSCO International's W-Mentoring program and POSCO E&C's DIBE diversity council
- Employs 57 indigenous people at POSCO Argentina in lithium-related operations and perform duties in lithium salt lake and plant operations, maintenance, coordination, and supervisory roles, enabling local employees to fully demonstrate their capabilities

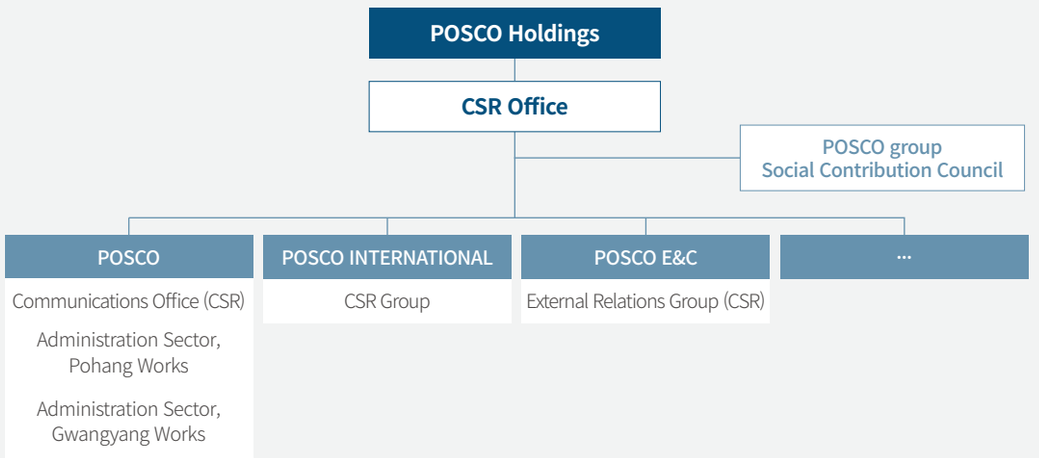
Local Community

MANAGEMENT FRAMEWORK

Dedicated Organizations

In 2025, POSCO Holdings established the CSR Office to lead strategic group-wide social contribution activities and serve as the control tower for these efforts. POSCO group also operates the Social Contribution Council, joined by 12 operating companies* with dedicated social contribution organizations, to identify issues in the communities where business sites are located and work together on solutions.

POSCO group's Social Contribution Structure



* POSCO, POSCO International, POSCO E&C, POSCO Future M, POSCO DX, POSCO Flow, POSCO Steeleon, POSCO M-Tech, POSCO Wide, POSCO A&C, eNtoB, and POSCO Humans

Policy and Guidelines

Since its founding, POSCO group has grown alongside local communities and has pursued community-based social contribution activities by reflecting the views of diverse stakeholders. Following its transition to a holding company structure, the Group incorporated the protection of local residents' human rights, environmental rights, and grievance mechanisms into its Human Rights Management Policy. The Group also introduced a Stakeholder Engagement Policy that explicitly sets out respect for the rights of Indigenous Peoples under UN standards, as well as stakeholder participation and communication.

POSCO Holdings Human Rights Management Policy →

MANAGEMENT ACTIVITIES

Protection of Local Community Rights and Preventive Measures

POSCO group systematically identifies potential adverse impacts in advance and implements corrective and preventive measures to ensure that the rights of local residents are not infringed across its business activities. Under the group-wide framework for community engagement and issue management, major business sites operate dedicated communication teams. POSCO group also supports regular public hearings and consultative meetings with local residents, while maintaining ongoing dialogue with local communities and Indigenous Peoples. The Group operates a grievance system through which any stakeholder may submit concerns either by name or anonymously, and provides responses to the submissions received. The Group also shares and reviews community issues on an ongoing basis through regular consultative bodies with local governments and local NGOs.

POSCO group also operates a process to identify and address potential adverse impacts that its business activities may have on local communities. For new investment projects, ESG checklists are applied from the investment review stage to examine potential community-related risks and response measures. When issues arise, POSCO group develops and implements solutions that reflect community input, and monitors and reviews the outcomes after implementation.

Performance of Community Communication Channels

Communication channel	Local community input	POSCO group support	Improvement outcomes
Pohang Advisory Committee and Citizen Committee	Development of the local tourism industry and revitalization of the regional economy	· Space Walk (KRW 11.7 billion)	· Over 4 million cumulative visitors as of June 2026 · Revitalization of local tourism through Korea's largest experiential sculpture
Gwangyang Advisory Committee and Citizen Committee	Creation of a local landmark and linkage with major tourist destinations to revitalize the regional economy	· Gubong Mountain Interactive Sculpture (groundbreaking February 2025, completion scheduled for 2026)	· Expected establishment of a landmark symbolizing POSCO–community collaboration
POSCO group Sustainable Society Innovation Platform (POSCO SEED*)	Addressing social issues in regions where POSCO group operates—such as biodiversity and resource circulation	· Local university faculty, socially engaged students, and POSCO group affiliates collaborate to identify regional social issues, with solutions generated through the students' ideas	· Provision of business-aligned ideas through university-industry collaboration
Gwangyang Volunteer Organizations Council	Promotion of a volunteer culture within the local community	· Annual Gwangyang Volunteer Festival · Joint volunteer activities (skills-sharing, municipal cooperation) by local government and POSCO group	· Expanded citizen participation in volunteerism

* Sustainable Engagement & Empowerment for Development

Shared Growth with Local Community

POSCO group fosters shared growth with local communities through social contribution activities focused on nurturing future generations, supporting vulnerable groups and local community development, and contributing to culture.

POSCO 1% Foundation

Established in 2013, the POSCO 1% Foundation is a nonprofit foundation and POSCO group's flagship employee-participatory foundation in Korea. It is operated through donations of 1% of salary from employees of POSCO group companies and suppliers, together with matching contributions from the Company. A total of 38,017 employees from 36 POSCO group operating companies and 60 suppliers participate in the donation program.

2025 revenue
donation income (including company matching grants), interest income, etc.
KRW 9.8 billion

2025 expenses
program operating costs, general and administrative expenses, fundraising costs, etc.
KRW 7.75 billion

Number of program beneficiaries
36,643 persons

Key Achievements

Focus area	Program	2025 Key achievements
Developing Sustainable Future Talent	Sangsang-isang Science (since 2019)	Provided hands-on creative science education to 6,071 middle-school students at 46 schools in Pohang and Gwangyang
	4US (For Us) (since 2024)	Supported career programs for 25 multicultural and vulnerable high-school students in Pohang (with 25 university-student mentors participating)
Building Community Partnerships	Wings of Hope (since 2020)	Manufactured and provided advanced assistive devices for 35 national veterans who became disabled in the line of duty and one veterans hospital
	Hope Spaces (since 2019)	Provided customized remodeling for 14 aging public welfare facilities in Pohang and Gwangyang
	Echo Village: Korean Language School (since 2025)	Established a Korean language school in Cilegon, Indonesia, providing Korean-language education to 82 local youths, including those seeking employment in Korea
	Echo Village: 1% Global Volunteering (since 2015)	Volunteer construction of 6 houses for vulnerable groups in Cilegon, Indonesia (with 23 employees participating)
Strengthening Donor Engagement	Change My Town (since 2019)	Carried out 150 donor-led community-improvement projects (with 2,600 employees participating)
	1% My Little Charity (since 2018)	Donors identified 100 new beneficiary organizations; 27,465 participants took part in donation programs
	POSCO group Designated Projects (since 2013)	31 participating donor companies led initiatives, implementing 132 projects to support local communities

POSCO Educational Foundation

Established in 1971 as the Jecheol Scholarship Foundation to build educational infrastructure in local communities, the foundation was renamed the POSCO Educational Foundation in 2002. It currently operates 12 schools in Pohang, Gwangyang, and Incheon, ranging from kindergartens to elementary, middle, and high schools. Through high-quality education, the POSCO Educational Foundation works in partnership with local communities and strives to develop future talent who can contribute to the advancement of Korea and society at large.

Status of the POSCO Educational Foundation

Current Students
8,219 persons

Cumulative Graduates
135,952 graduates

Total Contributions by POSCO group
1971–2025
KRW 1,180.9 billion

Schools Operated
Pohang, Gwangyang, and Incheon
12 schools*

* **[Pohang]** Pohang Jecheol High School, Pohang Jecheol Technical High School, Pohang Jecheol Middle School, Pohang Jecheol Elementary School, Pohang Jecheol Jigok Elementary School, Pohang Jecheol Kindergarten **[Gwangyang]** Gwangyang Jecheol High School, Gwangyang Jecheol Middle School, Gwangyang Jecheol Elementary School, Gwangyang Jecheol Nam Elementary School, Gwangyang Jecheol Kindergarten **[Incheon]** Incheon POSCO High School

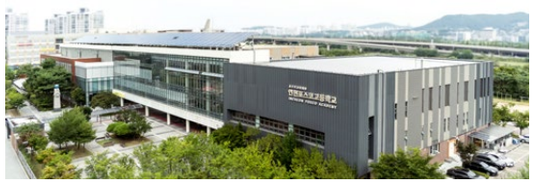
Key Achievements

1 **A Model for Developing Local Talent**
- Closing regional gaps in education
- Stable working conditions
- Response to low birth rates and regional depopulation

2 **More than 50 Years of Quality Education**
- Integrated curricula across school levels
- Talent, aptitude, and special programs

3 **Starting Point of an Industry–Academia Collaboration Value Chain**
- Developing outstanding local talent → A driver of corporate, regional, and national development

View of Pohang Jecheol High School


View of Incheon POSCO High School

POSCO TJ Park Foundation

Building on the talent development philosophy of POSCO founder and Honorary Chairman Tae-Joon Park, known by his pen name Cheongam, the POSCO TJ Park Foundation operates a diverse portfolio of scholarship programs both in Korea and abroad to develop global community leaders. The Foundation creates social value through initiatives including the POSCO TJ Park Awards, which honor individuals and organizations that have contributed to basic science, education, and service, and the POSCO Global Scholarship, which supports students from around the world.

Key Achievements (Cumulative)

POSCO TJ Park Awards
(Honoring contributors to the advancement of humanity and society)

68 recipients

- 4 fields (Science Prize, Education Prize, Community Development and Philanthropy Prize, Technology Prize)

POSCO Global Scholarship
(Developing the next generation of global talent)

6,718 students

- Scholarship for Students Studying in Korea: 562 students from 33 countries
- Scholarship for Global Leading Universities: 6,077 students from 20 countries
- Opinion Leader Fellowship: 79 students from 10 countries

POSCO Science Fellowship
(Cultivating talent in basic science)

543 scientists

- Select early-career scientists in four (4) basic science fields and two (2) applied science fields: metals and new materials, and rechargeable battery materials

POSCO Youth Fellowship
(Supporting youth and young adults in local communities)

1,951 persons

- Vision Scholarship: 676 college students in local communities
- Heroes Fellowship: 136 heroes and their children
- Lighthouse Scholarship: 1,139 high school students in local communities

2026 Certificate Awarding Ceremony for New POSCO Scholarship Students Studying in Korea and Graduation Farewell Ceremony

20th POSCO TJ Park Awards Ceremony in 2026

Cultural Contribution

POSCO group carries out a range of cultural contribution activities to foster shared growth with local communities and expand public access to culture. The Group contributes to creating local landmarks and generating tangible economic benefits, while sharing cultural value with citizens through the POSCO Art Museum, POSCO Classic, and other programs.

Local Landmark Development

Pohang Space Walk

Space Walk, created by POSCO in 2021 at Hwanho Park in Pohang, is a steel structure that combines artistic value with an experiential element. It attracts visitors from Korea and abroad and contributes to revitalizing the local economy.

※ Key Achievements
Key achievements include 4 million cumulative visitors as of June 2026, the Presidential Award at the 2022 Korea Spatial Culture Awards, designation as a 2023 Korea Tourism Star, and selection by the Ministry of Culture, Sports and Tourism as one of Korea's Top 100 Tourist Attractions for both 2023–2024 and 2025–2026

Rendering of the sculpture on Gubong Mountain in Gwangyang

POSCO plans to build an experiential steel structure at the summit of Gubongsan Mountain in Gwangyang, Jeollanam-do. Following a review in 2024 by a judging committee composed of experts across relevant fields, a work by Manuel Monteserín was selected as the final design. Scheduled for completion in 2026, the structure is expected to become a landmark of light that blends with the panoramic landscape from the summit of Gubongsan Mountain.

POSCO Art Museum

POSCO Art Museum opened in 1995 as POSCO Gallery and was registered with the Ministry of Culture, Sports and Tourism as a corporate art museum in 1998. Through a wide range of exhibitions and programs spanning tradition and contemporary art, the museum offers citizens opportunities to experience art and culture in everyday life across generations and genders.

2025 special exhibitions
(cumulative visitors: approximately 25,000)
- Stories of Paintings to Know Before It Becomes Embarrassing
- Flowers: A Brilliant Moment
- The Hidden Chapter
- Hanji Spectrum

POSCO Classic

POSCO group brings warmth and resonance to local communities through classical music. Since the 2019 performance featuring the Philadelphia Orchestra and pianist Seong-Jin Cho, the Group has continued to host classical concerts with world-renowned musicians each year. In 2025, POSCO Classic presented performances in Seoul, Pohang, and Gwangyang featuring the Philharmonia Orchestra and violinist Clara-Jumi Kang.

Philharmonia Orchestra & Clara-Jumi Kang Concert

Shareholder Rights

MANAGEMENT FRAMEWORK

Overview of Shareholders and Shareholding

Share Issuance

According to the Articles of Incorporation, POSCO Holdings is authorized to issue up to 200,000,000 shares. From the 96,480,625 common shares issued to date, 17,239,098 common shares* were retired using retained earnings, bringing the total number of shares issued to 79,241,527 common shares as of March 2026. The shares are not delineated by class, and only common shares have been issued to date.

* Aggregate of 1,691,425 shares canceled in July 2024, 255,428 shares in August 2024, 1,691,425 shares in March 2025, and 1,691,425 shares in March 2026

Overview of Shareholding and Shareholders

Category	Shares owned (No. of shares)			Ownership (%)
	End of 2023	End of 2024	End of 2025	End of 2025
Largest shareholder (National Pension Service)	5,393,999	6,160,584	6,441,610	7.96
BlackRock*	4,206,522	4,206,522	4,206,522	5.20
Registered executives	15,249	13,797	15,537	0.02
Treasury shares	8,695,023	7,003,598	5,312,173	6.56
Others	66,260,437	65,239,876	64,957,110	80.26
Total	84,571,230	82,624,377	80,932,952	100

* Based on BlackRock's disclosure submitted to the US SEC (Apr. 6, 2023)

Stock Trends

Category	2023	2024	2025
High (KRW)	658,000	488,000	335,000
Low (KRW)	272,000	253,500	230,500
Year-end closing price (KRW)	499,500	253,500	305,000
KOSPI Index (year-end)	2,655	2,399	4,214
Market capitalization (year-end, KRW million)	42,243,329	20,945,280	24,684,550

Shareholder Participation System

Promoting Participation Among Minority Shareholders

POSCO Holdings has introduced E-voting to protect the rights and facilitate the participation of minority shareholders. It also promotes proxy solicitation for all shareholders through disclosure, and has simplified the voting process with its proxy solicitation form made readily available on the POSCO website. The Annual General Meeting of shareholders in March 2026 was broadcast live online in both Korean and English, rendering its contents more broadly accessible to a wider audience.

- E-voting: Informed shareholders about how to vote electronically through AGM convocation notices and website pop-ups
- Disclosure of proxy solicitation

Protecting Shareholder Rights and Interests

Voting Rights

POSCO Holdings adheres to the "one share, one vote" principle to guarantee equal rights for all shareholders.

- Date of AGM: Mar. 24, 2026
- Date of convocation notice: Feb. 19, 2026 (4 weeks prior to the AGM)
- Disclosure of audit reports: Mar. 11, 2026 (1 week prior to the AGM; pursuant to Article 31 of the Enforcement Decree of the Commercial Act)
- Website detailing shareholders' exercise of voting rights

Summary of AGMs

Category	56th AGM	57th AGM	58th AGM
Date of AGM	2024.03.21.	2025.03.20.	2026.03.24.
AGM held outside the peak dates	Yes	Yes	Yes
Voting via mail	No	No	No
Electronic voting	Yes	Yes	Yes
Proxy solicitation	Yes	Yes	Yes

Dividends

Shareholder Return Policy

In January 2020, the Board specified POSCO Holdings' mid-term dividend policy to improve dividend transparency and predictability. The company set a shareholder return target of a payout ratio in the 30% range, based on consolidated net income attributable to controlling interests after adjusting for non-cash, one-off expenses, strengthening the link with business performance. During the 2020–2022 policy period, POSCO Holdings delivered record-high shareholder returns of KRW 3,383.6 billion, including KRW 2,816.1 billion in cash dividends and the 2022 cancellation of treasury shares equivalent to 3% of total shares issued, valued at KRW 567.5 billion based on book value.

In April 2023, POSCO Holdings announced a three-year shareholder return policy for 2023–2025, allocating 50–60% of annual standalone free cash flow to shareholder returns, paying a base dividend of KRW 10,000 per share, and returning any remaining funds additionally to shareholders. The company paid the base dividend for three consecutive years. In July 2024, it announced a treasury share policy to retire 6% of cancellable treasury shares over three years, together with a new KRW 100 billion treasury share repurchase and immediate cancellation. The repurchase and cancellation were completed in July 2024, and the 6% treasury share retirement was completed in three rounds by March 2026.

In April 2026, POSCO Holdings disclosed its new 2026–2028 mid-term shareholder return policy, targeting a shareholder return ratio[1] of 35–40%, including dividends and treasury share repurchases and cancellations, to reinforce its profile as a high-dividend company and improve dividend predictability. The company will enhance shareholder value by balancing strategic investment for future growth with stable dividends and treasury share returns, while improving dividend stability by adjusting one-off valuation gains or losses, such as large-scale asset impairments, from net income attributable to controlling interests. Through amendments to the Articles of Incorporation approved at the 55th and 57th Annual General Meetings of Shareholders, POSCO Holdings has introduced an advanced dividend procedure for year-end and quarterly dividends, under which dividends are determined before the record date. The company will continue to communicate transparently with shareholders and reflect shareholder rights in its return policy.

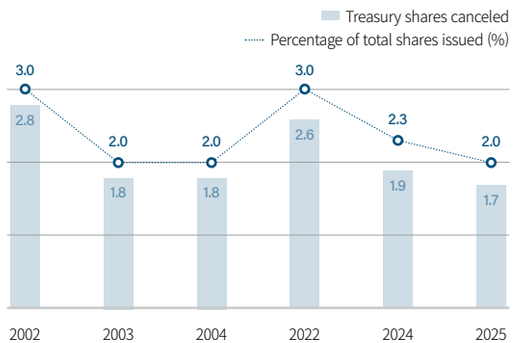
1) (Total dividends + treasury share repurchases and cancellations) / adjusted net income attributable to controlling interests × 100%

Dividends Paid

Category	2023	2024	2025
Consolidated payout ratio (%)	44.7	69.2	115.0
Dividend yield (%)	2.4	4.0	2.8
Dividend per share (KRW)	10,000	10,000	10,000
Target achievement rate*	100%	100%	100%

* Fulfillment of base dividend payments in line with the mid-term shareholder return policy (2023 -2025) (base dividend payout of KRW 10,000 funded by 50 -60% of separate free cash flow, followed by additional shareholder returns)

Treasury Shares Canceled



Shareholder Proposals

POSCO Holdings operates the shareholder proposal process in accordance with the Commercial Act.

- Under Article 363-2 of the Commercial Act, minority shareholders may submit proposals in accordance with applicable laws and regulations
- Shareholders holding at least 3% of voting shares, or at least 0.5% of shares for six months before the proposal date, may propose agenda items six weeks before the AGM and submit them to directors in writing or electronically

Cumulative Voting (2004)

- Shareholders holding at least 1/100 of total issued shares, excluding non-voting shares, may request cumulative voting in writing or electronically at least six weeks before an AGM convened to appoint two or more directors.
- Once requested, each shareholder receives votes equal to the number of directors to be elected per share held and may allocate them to one or more candidates. Directors are elected by highest vote count

Shareholder Nomination for Outside Director Candidates (2018)

- POSCO Holdings has operated the Shareholder Nomination Program since 2018, separate from shareholder proposals under the Commercial Act, to strengthen shareholder communication and secure a diverse pool of outside director candidates.
- Three to four months before the AGM, eligible shareholders receive official letters from the Chair of the Director Candidate Recommendation Committee and may recommend one prospective outside director candidate by email or postal mail.
- Recommended candidates undergo the same qualification review by the Outside Director Candidate Recommendation Advisory Panel as other candidates.
- For the March 2026 AGM, nominations were accepted from August 18 to 31, 2025.

Shareholder Communication

POSCO Holdings holds annual and quarterly performance briefings in the form of conference calls presided over by the Head of the Finance & IR Division. Following such briefings, the Company hosts periodic NDRs to share its mid- to long-term strategies with institutional investors in Korea, Asia, the Americas, and Europe. Corporate information, including IR materials, is disclosed to all shareholders in a fair and timely manner through the electronic disclosure systems of the Korea Exchange and the Financial Supervisory Service (FSS), POSCO Holdings' official website, and other disclosure inquiry systems. The company also fulfills its obligation to make English disclosures on the electronic disclosure system of the US SEC by listing its American Depositary Receipts (ADRs) on the New York Stock Exchange, and is working to release English disclosures on the website for foreign shareholders.

- Audit reports in English: Consolidated reports / Separate reports
- Business reports in English: 20-F disclosures
- Abridged English version of business reports submitted to the FSS

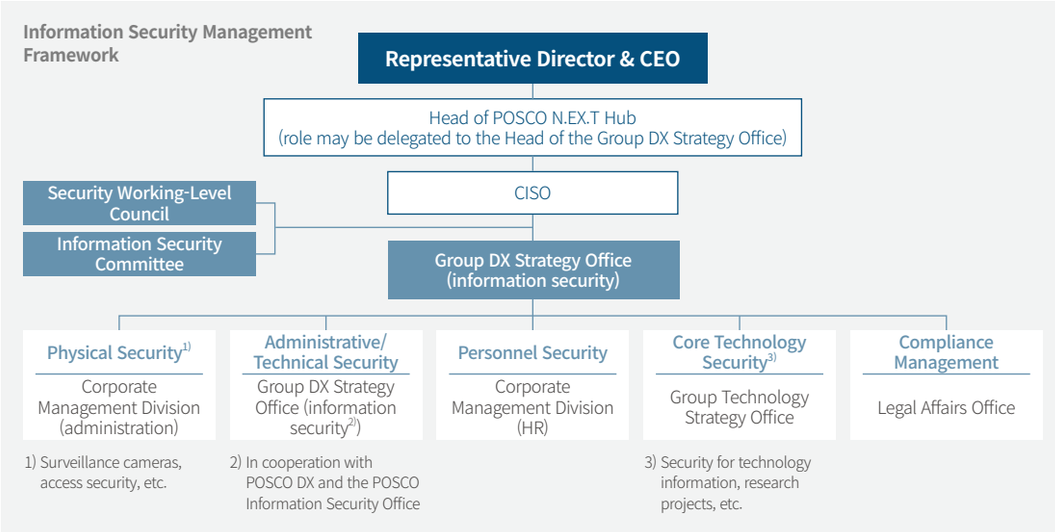
In March 2023, POSCO Holdings launched the POSCO Holdings IR YouTube channel to better meet the needs of individual investors and strengthen communication. Over the following year, POSCO Holdings uploaded 61 videos designed to explain POSCO group's key businesses in an accessible way for individual investors. As of December 2025, the channel had approximately 27,021 subscribers and recorded 31.61 million cumulative views.

Information Security

MANAGEMENT FRAMEWORK

Chief Information Security Officer

Since its launch in March 2022, POSCO Holdings has designated its information security executive as the Chief Information Security Officer (CISO), with the CISO concurrently serving as the Chief Privacy Officer (CPO). Under this structure, information security and personal information protection are managed and overseen in an integrated manner. Dedicated personnel within the Group DX Strategy Office, where the CISO is positioned, carry out information security management for POSCO group.


Information Security Management Framework
Representative Director & CEO
Head of POSCO N.EX.T Hub
(role may be delegated to the Head of the Group DX Strategy Office)
CISO
Security Working-Level Council
Information Security Committee
Group DX Strategy Office
(information security)
Physical Security1)
Corporate Management Division (administration)
Administrative/ Technical Security
Group DX Strategy Office (information security2))
Personnel Security
Corporate Management Division (HR)
Core Technology Security3)
Group Technology Strategy Office
Compliance Management
Legal Affairs Office
1) Surveillance cameras, access security, etc.
2) In cooperation with POSCO DX and the POSCO Information Security Office
3) Security for technology information, research projects, etc.

Information Security Committee and Group CISO Council

POSCO Holdings' information security organization is centered on the Information Security Committee and the Group CISO Council, which strengthens information security management at the Group level. The Information Security Committee is chaired by the CISO of POSCO Holdings and discusses the direction and implementation plans for company-wide information security policies each year. Decisions made by the Committee are incorporated into company regulations and business processes and applied across the organization.

The Group CISO Council convenes quarterly and is attended by CISOs and information security personnel from 26 operating companies that handle information related to the Group's core businesses and technologies, including POSCO, POSCO International, POSCO E&C, and POSCO Future M. The Council reviews the status of group-wide information security management and shares major security issues.

Information Security Policy

Based on its information security principles, POSCO Holdings has established regulations on information security and data privacy, and operates nine detailed guidelines. The regulations and guidelines are updated annually in consideration of the latest laws, systems, and internal and external environments, and finalized through deliberation by the Company-wide Information Security Committee. Relevant documents are made available to all executives and employees through the Company regulation management system, and updates are posted on the Company portal. POSCO Holdings manages these regulations and guidelines systematically and encourages all employees to actively comply with them.

9 Information Security Guidelines

Information Security Regulations, Personal Information Protection Regulations, Document Management Guidelines, Information System Security Guidelines, POSCO Center Access and Facility Security Guidelines, Technology Information Security Management Guidelines, POSCO N.EX.T Hub Information Security Guidelines, Security Inspection Guidelines for Retired Employees with Core Technologies, and Personal Video Information Management Guidelines

Information Security Policy Operating System

Plan
Develop information security policies and plans
Establish information security regulations/guidelines and devise information security plans aligned with business goals
Check
Measure and review outcomes
Assess the effectiveness and implementation of policies through regular monitoring
Do
Allocate resources and implement policies
Allocate human/technical/financial resources, implement regulations/ guidelines, and conduct training sessions and exercises for employees
Act
Make ongoing improvements
Identify issues and update policies, plans, and processes

Information Security Budget and Investments

POSCO Holdings allocates 6.3% of its total IT budget to information security, reflecting the organization's priorities, internal and external risks, and legal requirements. The effectiveness of information security investments is evaluated through regular performance measurement, supporting the organization's risk management and regulatory compliance.

Information Security Certification Management

POSCO group systematically manages information security risks through surveillance and renewal audits for TISAX (Trusted Information Security Assessment Exchange), ISO/IEC 27001, and Information Security Management System (ISMS) certifications at major operating companies. All three companies subject to mandatory certification under the Act on Promotion of Information and Communications Network Utilization and Information Protection have completed certification, while the remaining eight have voluntarily obtained internationally recognized certifications, strengthening information security across the Group.

Information Security Certifications

Company	Certification	Remarks
POSCO HOLDINGS	TISAX	Voluntary
POSCO	ISO/IEC 27001, TISAX	Voluntary
POSCO INTERNATIONAL	ISO/IEC 27001, TISAX, Cybersecurity Readiness Assessment	Voluntary
POSCO E&C	ISO/IEC 27001, ISMS-P	Voluntary
POSCO FUTURE M	ISO/IEC 27001	Voluntary
POSCO DX	ISMS	Mandatory
POSCO FLOW	ISO/IEC 27001	Voluntary
POSCO WIDE	ISO/IEC 27001	Voluntary
eNtoB	ISMS	Mandatory
eSteel4U	ISMS	Mandatory
POSCO HY CLEAN METAL	TISAX	Voluntary

Strengthening Information Security Certifications

POSCO group continues to strengthen information security certifications across Group companies. In the steel business, POSCO maintains ISO 27001 certification and obtained TISAX certification from the ENX Association in 2025, while providing tailored information security consulting to overseas subsidiaries, operating companies, and suppliers. In the infrastructure business, POSCO International became the first Korean general trading company to obtain TISAX certification in 2024 and maintained an AAA rating in the 2025 Information Security Readiness Assessment. POSCO E&C obtained ISMS-P certification in 2024, expanding its scope from employee information protection to personal information protection for residents of The Sharp, and operates a follow-up management system to address audit risks by severity. POSCO DX maintains ISMS certification for IDC operations and integrated security monitoring services, strengthening the execution of its security management system. In the rechargeable battery materials business, POSCO Future M, as a company holding national core technologies, implements protective measures through statutory inspections and leads information security assessments for affiliates and suppliers, strengthening security capabilities across the supply chain.

Information Security Risk Management

As digital transformation and global business expansion increase information security and cybersecurity risks, POSCO group systematically identifies these risks at the Group level. Recognizing that such risks may extend beyond internal systems to suppliers, overseas subsidiaries, external partners, and the broader supply chain, the Group reviews vulnerabilities across information assets, IT infrastructure, personal information, and operational technology environments. POSCO group also assesses the likelihood of security incidents in advance, considering major cyber threats such as external intrusions, information leakage, and ransomware. Based on identified vulnerabilities, the Group establishes improvement plans and takes corrective measures to manage information security risks across the supply chain, including operating companies, overseas subsidiaries, and suppliers.

Information Security Assessment Items by Area

Category (no. of inspection items)	Details
Security management systems (9)	Specification of security management organizations, standards, and activities
Raising security awareness (6)	Reward and disciplinary systems, and personnel training and education
HR management (5)	Security controls by employment stage (hiring, employment, and retirement)
Information assets (4)	Classification and management of information assets and leakage control
Protected areas (7)	Designation and management of protected areas and access control
Information systems (17)	Establishment and operation management of IT and security infrastructure
Security audit (1)	Security audits and inspections and security incident response system
Personal data (11)	Collection, retention, and disposal of personal and video data

Corrective Actions Based on 2025 Information Security Diagnostics

Operating companies
On-site information security inspections at 31 companies

Overseas subsidiaries
Corrective measures completed for website vulnerabilities (26 cases) and internal system vulnerabilities (118 cases)

Suppliers*
On-site, hands-on consulting for 60 companies

*Include Group companies engaged in cooperative work

Protection of National Core Technologies

To protect national core technologies, POSCO group has established a rigorous information security framework by actively adopting the latest security technologies and policies. Through these efforts, the Group minimizes the risk of technology leakage, strengthens security awareness through ongoing training and awareness-raising activities, and regularly reviews and updates its security systems to respond to cyber threats. POSCO group remains committed to securely protecting and managing national core technologies.

Information Security Training

POSCO group provides mandatory annual information security training for all employees, including contract employees, and operates tailored programs for leaders and employees in specialized roles. Supplier employees working on-site at POSCO group business sites are also required to complete information security training, strengthening overall information security capabilities.

Tax Payment

MANAGEMENT FRAMEWORK

Policy

POSCO group strictly complies with the tax laws and regulations of the Republic of Korea and all other countries where it operates, and rigorously adheres to its tax policy, which includes the fundamental principles of prohibiting tax avoidance and applying arm's length transfer pricing.

POSCO Holdings' Tax Policy →

Transparent Tax Compliance

POSCO group faithfully fulfills its tax reporting and payment obligations not only under domestic regulations but also under the regulations of each country where it conducts business. In doing so, the Group maintains transparent relationships with tax authorities in each jurisdiction and diligently meets all taxpayer obligations, including the submission of documents as required by law. In transactions with related parties, POSCO group adheres to the principle of conducting arm's length transactions in accordance with the OECD Transfer Pricing Guidelines and the applicable laws of each country. The Group does not pursue tax avoidance through transfer pricing or tax benefits through tax havens. POSCO group submits BEPS (Base Erosion and Profit Shifting) reports annually to tax authorities and provides additional documentation upon request in countries where cross-border transactions with foreign related parties occur.

Tax Payment Status

(Unit: KRW 100 million)

Financial Reporting	2024	2025	Remarks
Earnings Before Tax	12,512	11,068	
Reported Taxes	3,036	6,024	Income statement (Corporate income tax expense)
Reported Tax Rate	24.27%	54.43%	
Cash Taxes Paid	5,537	8,403	Cash flow statement (Corporate income tax paid)
Cash Tax Rate	44.25%	75.92%	

Corporate Income Tax by Region in 2025

(Unit: KRW 100 million)

Category	Country	Business entity	Business Area	Revenue*	Operating profit (Loss)	Corporate income tax expense (Income)
Total				1,172,408	31,763	6,070
Domestic	Republic of Korea			821,719	29,999	4,306
		POSCO	Manufacture and sale of steel materials	350,108	17,804	2,881
		POSCO INTERNATIONAL	Trading, resource development	269,566	8,546	651
		POSCO E&C	Plant and construction	66,995	(4,903)	(1,697)
		POSCO FUTURE M	Cathodes, anodes, refractories	26,894	236	(634)
		Others	DX, logistics, Processing and sale of steel materials and others	108,155	8,315	3,106
Overseas				350,690	1,764	1,764
Southeast Asia				122,436	3,096	811
	Indonesia	PT.KRAKATAU POSCO / POSCO-IJPC, etc.	Processing and sale of steel materials	37,448	2,345	321
	Vietnam	POSCO-VIETNAM / POSCO-VST / PY-VINA, etc.	Manufacture and sale of steel materials	28,191	375	191
	Singapore	POSCO INTERNATIONAL SINGAPORE, etc.	Trading	33,943	(29)	110
	Thailand	POSCO THAINOX / POSCO-TBPC / POSCO-TCS, etc.	Processing and sale of steel materials	17,311	253	154
	Malaysia	POSCO-MKPC / POSCO-MALAYSIA, etc.	Processing and sale of steel materials	4,320	14	20
	Philippines, etc.	POSCO-PMPC, etc.	Processing and sale of steel materials	1,223	138	15
China		POSCO CHINA, etc.	Processing and sale of steel materials	60,373	(2,014)	(82)
Japan		POSCO-JAPAN / POSCO INTERNATIONAL JAPAN, etc.	Trading of steel materials and others	35,303	302	96
India		POSCO MAHARASHTRA / POSCO-IPPC, etc.	Manufacture and sale of steel materials	37,377	1,541	359
North America				30,862	(52)	149
	US	POSCO INTERNATIONAL AMERICA, etc.	Trading	30,803	133	35
	Canada	POSCAN, etc.	Sale of coal and others	60	(186)	114
South America				25,717	(1,881)	181
	Mexico	POSCO-MEXICO / POSCO-MPPC, etc.	Manufacture and sale of steel materials	25,064	233	181
	Argentina, Brazil	POSCO ARGENTINA/ POSCO BRAZIL	Producing lithium, sale of steel materials and others	653	(2,114)	0
Europe				32,848	(38)	80
	Poland	POSCO-PWPC, etc.	Processing and sale of steel materials	1,473	(123)	3
	Italy	POSCO-ITPC / POSCO INTERNATIONAL ITALIA, etc.	Processing and sale of steel materials, trading, and others	10,064	55	2
	Germany	POSCO INTERNATIONAL DEUTSCHLAND, etc.	Trading	12,659	30	6
	Slovenia, Türkiye, etc.	POSCO ESDC / POSCO ASSAN TST, etc.	Manufacture and sale of steel materials	8,652	0	68
Australia		POSCO-AUSTRALIA, etc.	Resource development and investment	5,369	987	171
Other Regions			Trading and others	405	(176)	0

* Sales prior to exclusion of internal transactions

Policy Support

MANAGEMENT FRAMEWORK

Policy

POSCO group strictly prohibits political donations or sponsorships for political purposes in accordance with the Code of Ethics, Anti-Corruption Policy, and the Political Funds Act of the Republic of Korea.

Code of Ethics

The provision or solicitation of money, gifts, entertainment, or personal favors such as congratulatory or condolence payments is prohibited under any circumstances. Exceptions and specific monetary thresholds are clearly defined

Anti-Corruption Compliance Guidelines

Complies with the laws and regulations of all countries of operation, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act, and upholds international standards such as the OECD Anti-Bribery Convention, the UN Convention Against Corruption, and the UN Global Compact

POSCO HOLDINGS Board Governance Policy

Donations or sponsorships exceeding KRW 100 million but not exceeding KRW 1 billion require review and approval by the ESG Committee. Donations or sponsorships exceeding KRW 1 billion require prior review by the ESG Committee and final approval by the Board

(Unit: KRW 1,000; foreign currencies are separately stated in each local currency)

Company	Association	Country of association	Purpose of participation	Role of company	Membership fee (2025)
POSCO HOLDINGS	World Steel Association (worldsteel)	Belgium	Jointly address global issues in the steel industry, including demand-side trends, climate change, and safety, aiming to advance the interests of the global steel industry	Leadership in hosting the worldsteel Breakthrough Technology Conference to accelerate the global steel industry's low-carbon transition	1,088,480
	World Economic Forum (WEF)	Switzerland	Understand global economic trends and secure insights for strategic business planning	Strengthen networks with potential business partners and contribute to global issue resolution through WEF membership	512,900
	The American Chamber of Commerce in Korea	Korea	Strengthening U.S. networks and public affairs capacity to capitalize on business opportunities and navigate trade policy shifts in the U.S. market	Contribute to trade promotion with the U.S. in steel and rechargeable battery sectors	-[1]
	Australian Chamber of Commerce in Korea (AustCham Korea)		Exchange information to ensure smooth operations in Australia and promote bilateral trade	Contribute to bilateral trade in steel raw materials and lithium sectors	20,000
	Indian Chamber of Commerce in Korea (ICCK)		Strengthen information exchange and networking to expand investment in India and advance the integrated steel mill business	Contribute to enhancing economic cooperation between the two countries by expanding business and investment in India	4,000
	Korea-Japan Economic Association		Expand information exchange and networking to strengthen Korea-Japan trade and industrial-technology cooperation	Contribute to growth foundations for core businesses such as steel and rechargeable batteries and to stronger bilateral economic cooperation	20,800
	Korea Hydrogen Alliance (H2KOREA)		Exchange domestic and international hydrogen-related technology and business trends; corporate and government networking; policy recommendations; and cooperation on regulatory response	Support the establishment of a hydrogen ecosystem and provide related policy recommendations from the perspective of a clean-hydrogen consumer for hydrogen reduction ironmaking	20,000
	Korea Atomic Industrial Forum (KAIF)		Government networking for nuclear-industry companies and cooperation on policy proposals	As a member, provide policy recommendations for utilizing clean nuclear power and hydrogen	1,000
	Korea Chamber of Commerce and Industry (KCCI)		Establish a channel to improve laws and systems related to corporate management	Act as a vice-chair company to facilitate communication with domestic and global business/government stakeholders and support regulatory dialogue and corporate innovation.	100,000
	Federation of Korean Industries (FKI)		Improve the business environment (labor, regulation, etc.), enhance global competitiveness, and expand ESG management	Communicate with major industry and government stakeholders and raise regulatory issues to improve the business environment	862,000
POSCO America	National Foreign Trade Council	US	As a foreign trade council, jointly respond to U.S. trade issues with global companies	Communicate the Company's position on key policies such as steel and rechargeable batteries and participate in coalition activities	USD 10,000
	Washington International Trade Association		Collect information on trade and industrial policy trends and build networks with relevant experts and government officials	Enhance corporate visibility by participating in trade and industrial policy discussion events	USD 350
	American Metals Supply Chain Institute		Activities of a steel industry association representing importers to the U.S.	Activities of a steel industry association representing importers to the U.S.	USD 4,000
	US Association of Former Members of Congress(USAFMC)		Leverage the network of former federal lawmakers to track legislative and policy trends and gain congressional insights	Build trust with former lawmakers through participation in and sponsorship of Korea-related programs	USD 17,500
	US Chamber of Commerce		Collect information on trade and industrial policy issues and trends	Collect information on trade and industrial policy issues and trends	USD 5,000
	SAE INTERNATIONAL		Sense the latest technology trends in the mobility field and network with experts	Regularly collect market and technology trend information and attend major conferences hosted by SAE	USD 135
POSCO Europe	Association of Korean Industries in Belgium	Belgium	Strengthen partnerships with Korean companies in Belgium and enhance responsiveness to local developments	Attend regular and ad hoc meetings to monitor trends in EU political and economic policy	EUR 1,200
POSCO	Korea Iron & Steel Association (KOSA, including affiliated organizations)	Korea	Enhance the competitiveness and sustainable development of the steel industry	Support outreach activities to propose policies for ecosystem resilience and respond to trade regulations to stabilize the domestic market	3,704,656
	Korea Employers Federation (KEF)		Support external policy activities of a consultative body to strengthen the global competitiveness and sustainability of the Korean steel industry (e.g., responding to climate change and trade issues)	POSCO's Representative Director serves on the vice-chairman body and participates in various meetings on labor relations, ESG, and other matters	337,011
POSCO INTERNATIONAL	Chambers of Commerce (Seoul, Incheon, and Gwangyang Chambers of Commerce)		Enhance the Company's core value based on diverse information and business networks	The Representative Director serves as Chair of the International Trade Committee at the Korea Chamber of Commerce and Industry (KCCI); contribute to monitoring domestic and global trade and industrial policy trends and developing proactive industry strategies by attending major meetings	138,200
	Korea International Trade Association (KITA)		Identify trade and commerce issues, strengthen government and industry networks, and respond to external risks	As a global trade and investment company, share industry views based on field business experience and respond to trade issues	1,000
POSCO E&C	Construction Association of Korea		Contribute to the sound growth and development of the construction industry	Monitor key issues and trends in the construction industry; participate in policy and regulatory improvement	878,050
POSCO FUTURE M	Korea Battery Industry Association (KBIA)		Enhancing the status of Korea's battery materials industry and contributing to the advancement of the battery industry	As the association's chair member company, present policy opinions for the development of the battery industry, gather insights on industry issues and trends, and attend major exhibitions (InterBattery) and secondary battery forums	130,000
	Korea Refractories Industry Cooperative		Share technical data on the manufacture and sale of refractories in Korea and discuss strengthening the competitiveness of the refractories business	Exchange information on issues in Korea's refractories industry and operate technical-personnel training programs	41,600
	Gwangyang Chamber of Commerce and Industry		Expand industry networks in the Gwangyang region, exchange information on issues, and identify cooperation opportunities	Participate in discussions on policy and institutional improvements that build a foundation for shared growth and industrial development in the Gwangyang region	40,000

1) No payment was made in 2025, as annual membership fees for the three-year period from 2023 to 2025, totaling KRW 180 million, were paid in 2023

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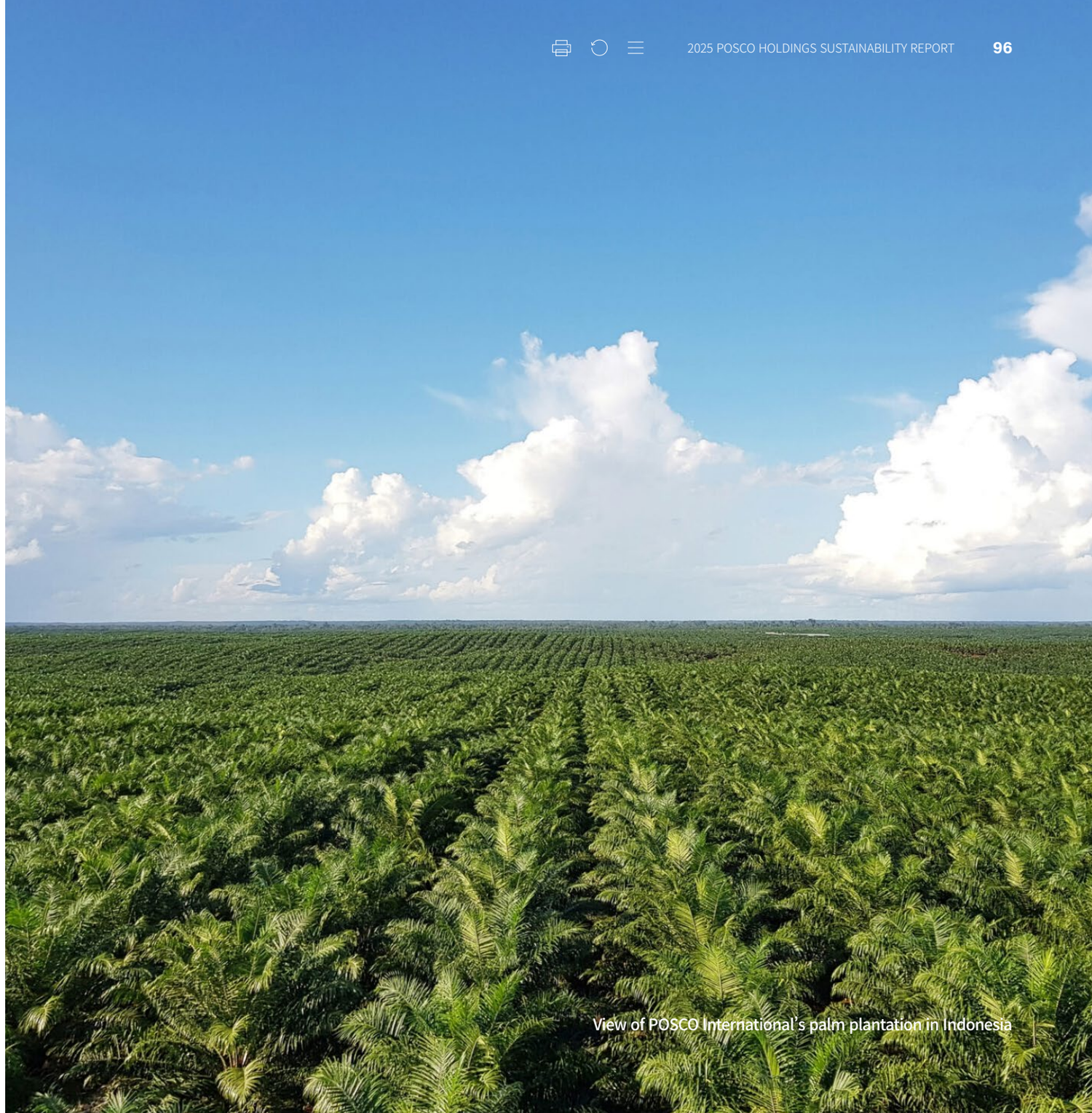

View of POSCO International's palm plantation in Indonesia

Fact Book

ESG Fact Book _ Financial Information

Summary Financial Information by Business Segment

Business Segment	Assets[1]						Sales[1]					
	2023		2024		2025		2023		2024		2025	
	KRW million	%	KRW million	%	KRW million	%	KRW million	%	KRW million	%	KRW million	%
Steel	66,224,069	41	66,585,437	40	65,563,164	38	40,393,273	52	39,104,095	54	37,284,859	54
Infrastructure (trading)	19,650,557	12	21,012,507	13	23,642,210	14	24,033,506	31	22,803,773	31	23,744,104	34
Infrastructure (construction)	9,631,691	6	9,270,877	6	9,797,114	6	8,301,130	11	7,473,006	10	5,615,425	8
Infrastructure (logistics and other)	2,476,842	2	2,592,169	2	2,041,956	1	470,613	1	421,742	1	308,698	0.4
Rechargeable Battery Materials	10,909,515	7	15,090,058	9	17,624,390	10	3,816,042	5	2,812,549	4	2,096,318	3
Other	51,957,529	32	50,946,666	31	52,173,819	31	112,633	0.1	72,978	0.1	45,482	0.1
Total	160,850,203	100	165,497,714	100	170,842,653	100	77,127,197	100	72,688,143	100	69,094,886	100

1) Assets exclude intra-segment transactions; sales represent external sales after eliminating internal transactions.

Sales by Region

By Region	Sales[1]					
	2023		2024		2025	
	KRW million	%	KRW million	%	KRW million	%
Korea	50,658,510	66	45,960,140	63	42,516,707	62
Asia (Others*)	7,287,382	9	7,382,157	10	7,751,121	11
China	6,152,191	8	5,737,686	8	5,160,583	7
Indonesia	3,422,647	4	3,156,962	4	2,873,999	4
Europe	2,468,508	3	2,743,528	4	3,065,738	4
Japan	2,691,788	3	2,814,631	4	2,590,102	4
U.S.	2,095,705	3	2,504,563	3	2,780,769	4
Other regions	2,350,466	3	2,388,476	3	2,355,867	3
Total	77,127,197	100	72,688,143	100	69,094,886	100

* Excluding China, Indonesia, and Japan
1) External sales after eliminating internal transactions

Financial Information of Major Companies (FY2025)

Company	Category	Assets	Sales	Profit (Loss)
		KRW million		
POSCO HOLDINGS	Holding company, listed	51,815,585	1,403,310	494,878
POSCO	POSCO HOLDINGS ownership: 100%, unlisted	45,038,613	35,010,837	1,143,180
POSCO INTERNATIONAL	POSCO HOLDINGS ownership: 70.71%, listed	13,725,392	26,956,598	513,830
POSCO E&C	POSCO HOLDINGS ownership: 52.8%, unlisted	8,060,650	6,699,511	(495,923)
POSCO FUTURE M	POSCO HOLDINGS ownership: 58.18%, listed	7,828,096	2,676,969	31,815
POSCO DX	POSCO HOLDINGS ownership: 65.38%, listed	814,795	1,046,633	52,384
POSCO FLOW	POSCO HOLDINGS ownership: 100%, unlisted	595,638	2,329,632	27,090
POSCO STEELEON	POSCO ownership: 56.87%, listed	479,864	1,093,989	14,436
POSCO M-TECH	POSCO ownership: 48.85%, listed	155,202	357,432	1,411
POSCO MOBILITY	POSCO INTERNATIONAL ownership: 100%, unlisted	928,344	1,182,165	486

ESG Fact Book _ Major Domestic Companies (Consolidated)

Since the 2024 Sustainability Report, POSCO Holdings has disclosed information by business segment—Steel, Infrastructure, and Rechargeable Battery Materials—in line with the nature of each business and the financial reporting structure.
The scope of reporting subsidiaries by business segment and reporting year is presented below; any differences are disclosed in separate footnotes.

(1) Reporting Subsidiaries by Business Segment

- **Steel:** POSCO, POSCO STEELEON, and POSCO M-TECH (supplies steel products to industries such as automotive, shipbuilding, and home appliances)
- **Infrastructure:** POSCO INTERNATIONAL (trading, etc.), POSCO E&C (construction), POSCO DX (IT), POSCO FLOW (logistics), and POSCO MOBILITY SOLUTION (manufacturing)
- **Rechargeable Battery Materials:** POSCO FUTURE M (lithium, nickel, cathode materials, anode materials, recycling, and other EV battery materials)

(2) Reporting Subsidiaries by Year

- **2023, 2024, and 2025 (10 companies):** POSCO HOLDINGS, POSCO, POSCO INTERNATIONAL, POSCO E&C, POSCO FUTURE M, POSCO DX, POSCO FLOW, POSCO STEELEON, POSCO MOBILITY SOLUTION and POSCO M-TECH

Environmental

- POSCO Holdings' environmental data covers POSCO Center, the Gangneung Business Site, and the Future Technology Research Institute in Pohang (included from 2024). The reporting scope of each operating company is aligned with that company's sustainability report.

Climate Change

GHG Emissions

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Direct and indirect GHG emissions[2]	tCO_2e	6,645	72,091,894	4,515,705	2,388,831	79,003,075	10,746	71,193,149	5,158,166	2,298,133	78,660,194	10,693	69,968,665	4,097,770	2,200,344	76,277,472
Direct emissions (Scope 1)		1,358	70,650,464	4,351,130	2,022,088	77,025,039	1,057	69,734,198	4,990,315	1,885,309	76,610,880	1,466	68,512,009	3,945,990	1,874,280	74,333,745
Indirect emissions (Scope 2)		5,289	1,441,437	164,580	366,750	1,978,056	9,689	1,458,960	167,858	412,832	2,049,338	9,229	1,456,662	151,781	326,071	1,943,743
Direct and indirect GHG emissions intensity[3]	tCO_2e/(t-crude steel, KRW 100 million)	0.46	2.02	10.46	53.59	-	0.54	2.03	12.38	63.68	-	0.76	2.02	10.72	82.20	-

1) For POSCO Center, figures represent the combined total for tenant companies, excluding entities designated under the Emissions Trading Scheme or the Target Management System.
2) Based on the Ministry of Climate, Energy and Environment's GHG Statement; emissions are truncated below the decimal point by business site before aggregation, and totals may differ accordingly.
3) For Steel, the intensity is based on POSCO's crude steel production volume on a stand-alone basis; other sectors are based on sales of reporting companies on a stand-alone basis.

* Scope 3 GHG emissions and certificates are available in each operating company's sustainability report.
Steel: POSCO ↗ Infrastructure: POSCO INTERNATIONAL ↗ POSCO E&C ↗ POSCO DX ↗
Rechargeable Battery Materials: POSCO FUTURE M ↗

Energy Consumption

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Direct and indirect energy consumption[2, 3]	GJ	137,263	356,444,954	88,411,735	17,764,328	462,758,280	223,299	361,750,620	101,697,435	18,249,494	481,920,848	221,741	352,167,978	81,575,108	16,285,774	450,250,601
Direct energy consumption		26,752	344,145,919	84,993,244	10,129,127	439,295,043	20,835	349,300,872	98,187,732	9,611,448	457,120,886	28,885	339,775,898	78,397,404	9,456,121	427,658,308
Coal[4]		-	-	-	36	36	-	-	-	-	-	-	-	-	117,785	117,785
Natural gas		26,752	46,899,454	84,779,252	255,371	131,960,829	20,835	62,261,997	97,202,797	297,011	159,782,640	28,885	58,781,520	78,250,749	404,069	137,465,223
By-product gas[4]		-	294,489,643	-	9,373,190	303,862,833	-	284,088,474	-	9,206,800	293,295,274	-	279,431,138	-	8,924,399	288,355,537
Other fuels[5]		-	2,756,822	213,993	500,530	3,471,346	-	2,950,401	984,935	107,637	4,042,973	-	1,563,240	146,655	9,868	1,719,763
Indirect energy consumption		110,511	12,299,035	3,418,491	7,635,200	23,463,237	202,464	12,449,748	3,509,703	8,638,046	24,799,962	192,856	12,392,081	3,177,703	6,829,653	22,592,293
Electricity		110,511	11,975,992	3,260,764	7,550,603	22,897,870	202,464	12,127,042	3,361,158	8,561,812	24,252,477	192,856	12,089,341	3,041,759	6,756,107	22,080,062
Steam[6]		-	323,043	157,728	84,597	565,368	-	322,706	148,546	76,234	547,486	-	302,740	135,878	73,546	512,164
Renewable energy consumed[3, 7]	GJ	-	459	-	790	1,249	-	1,162	4,194	11,753	17,109	-	9,894	5,785	12,098	27,776

1) For POSCO Center, figures represent the combined total for tenant companies, excluding entities designated under the Emissions Trading Scheme or the Target Management System.
2) Discrepancies may occur between totals and the sum of sub-categories, as energy consumption by source is rounded down by business site before aggregation.
3) Prior-year data have been restated to correct a clerical error.
4) For POSCO, coal is used as an iron ore reductant and is therefore not counted as energy consumption; the gas generated in the process is used as an energy source and counted as by-product gas.
5) Includes B-C oil, kerosene, gasoline, diesel, propane, etc.
6) Includes waste heat purchased from external sources.
7) Renewable energy generated on-site or procured and used through Green Premium, RECs, PPAs, etc.

Major Domestic Companies (Consolidated)

Environmental

Environmental Management

Pollutants

Indicator	Unit	2023				2024				2025			
		Steel	Infrastructure	Rechargeable Battery Materials	Total	Steel	Infrastructure	Rechargeable Battery Materials	Total	Steel	Infrastructure	Rechargeable Battery Materials	Total
Air pollutant emissions[1), 2)]	ton	55,170	745	990	56,905	49,482	980	925	51,388	54,008	637	898	55,542
NOx		27,792	739	881	29,412	23,991	908	803	25,701	25,880	542	798	27,220
SOx		23,956	4	58	24,018	22,408	4	52	22,464	25,100	1	47	25,147
Dust		3,422	3	50	3,475	3,083	69	70	3,223	3,028	95	53	3,175
Water pollutant emissions[1), 2)]	ton	1,317	8	155	1,479	1,596	10	388	1,994	1,869	6	169	2,044
TOC		297	1	35	333	351	2	34	387	377	1	33	411
BOD		213	1	22	236	196	1	177	374	231	1	19	251
SS		136	1	55	191	161	4	138	303	217	2	56	275
T-N		669	5	43	717	883	3	39	925	1,024	3	54	1,080
T-P		2	-	0.3	2	6	-	0.3	6	20	-	7	27

1) Calculated using emissions from sites subject to mandatory pollutant emissions disclosure (domestic: sites subject to the Ministry of Climate, Energy and Environment's Operating Regulations for the Environmental Information Disclosure System; overseas: sites holding government environmental permits).
2) Prior-year report data have been restated following the finalization of 2024 government data.

Water

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS[1)] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1)] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1)] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Water withdrawal	ton	151,253	154,301,946	21,844,278	28,645,473	204,942,950	126,808	156,646,503	3,191,935	26,928,668	186,893,914	171,724	159,704,531	2,241,349	26,884,065	189,001,669
Municipal water		151,253	27,732	2,158,212	857,148	3,194,345	126,808	30,118	2,375,971	1,046,702	3,579,599	171,724	39,582	1,752,421	1,225,730	3,189,457
Surface water		-	115,497,855	94,614	2,228,391	117,820,860	-	119,307,357	76,325	2,012,785	121,396,467	-	123,138,088	65,071	1,603,002	124,806,161
Groundwater		-	4,158,878	426,178	-	4,585,056	-	4,556,880	514,044	-	5,070,924	-	4,167,560	358,992	-	4,526,552
Desalinated water		-	5,044,618	19,143,613	-	24,188,231	-	2,992,678	-	-	2,992,678	-	3,051,884	-	-	3,051,884
Reused municipal wastewater		-	29,572,863	-	-	29,572,863	-	29,759,470	-	-	29,759,470	-	29,307,417	-	-	29,307,417
Other		-	-	21,661	25,559,934	25,581,595	-	-	225,595	23,869,181	24,094,776	-	-	64,865	24,055,333	24,120,198
Water withdrawal in 'High' water-stress areas[2)]		-	84,054,014	117,058	797,301	84,968,373	-	87,319,386	9,845	990,107	88,319,338	-	89,090,409	8,240	1,113,720	90,212,369
Water withdrawal in 'Extremely High' water-stress areas[2)]		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Water consumption	ton	151,253	72,560,905	2,177,295	727,345	75,616,798	126,808	71,954,149	2,633,388	2,377,736	77,092,082	171,724	75,974,459	1,594,011	2,139,585	79,879,779
Water consumption in 'High' water-stress areas[2)]		-	38,181,117	4,940	283,067	38,469,124	-	37,013,437	9,845	413,319	37,436,601	-	39,431,219	8,240	331,263	39,770,721
Water consumption in 'Extremely High' water-stress areas[2)]		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Water discharge[3)]	ton	-	81,741,041	19,666,983	27,918,128	129,326,152	-	84,692,354	558,547	24,550,932	109,801,833	-	83,730,072	647,338	24,744,480	109,121,889
Recycled/reused water	ton	-	40,390,660	200,741	-	40,591,401	-	37,206,622	276,113	-	37,482,735	-	39,361,100	396,534	460,098	40,217,732
Water reuse rate[4)]	%	-	20.7	0.9	-	16.5	-	19.2	8.0	-	16.7	-	19.8	15.0	1.7	17.5

1) For POSCO Center, includes water withdrawal by all tenant companies.
2) Calculated based on the WRI (World Resources Institute) Aqueduct 4.0 Water Stress Map (as of May 2026).
3) Sum of water discharged after internal treatment and water treated by third parties.
4) Ratio of reused water to water withdrawal.

Major Domestic Companies (Consolidated)

Environmental

Environmental Management

Waste

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS[1] (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Waste generated	ton	202	19,531,185	700,081	298,756	20,530,223	557	20,213,571	1,389,943	306,239	21,910,311	596	19,898,308	490,806	321,106	20,710,816
Designated waste		-	110,758	640	2,405	113,803	43	108,602	619	4,579	113,843	44	115,118	511	4,295	119,968
Recycled		-	60,183	299	1,991	62,472	2	62,047	422	4,076	66,547	2	67,693	427	4,034	72,156
Incinerated		-	9,078	279	355	9,711	7	9,803	133	434	10,377	7	10,204	75	219	10,505
Landfilled		-	41,193	47	58	41,297	-	36,580	30	59	36,670	-	36,924	0.2	42	36,965
Other		-	305	15	2	322	34	171	34	0.1	240	35	297	8	1	340
General waste		114	19,420,427	11,126	295,752	19,727,420	402	20,104,969	28,718	301,121	20,435,210	442	19,783,190	11,569	316,530	20,111,731
Recycled		114	19,189,062	9,788	293,986	19,492,951	374	19,898,328	16,241	296,117	20,211,060	420	19,559,336	3,769	315,161	19,878,687
Incinerated		-	43,383	590	363	44,337	18	45,881	570	447	46,915	17	46,048	453	397	46,915
Landfilled		-	187,982	747	1,403	190,132	11	160,760	11,907	4,557	177,235	5	177,432	7,346	971	185,755
Other		-	-	-	-	-	-	-	-	-	-	-	375	-	-	375
Construction waste		87	-	688,315	598	689,001	112	-	1,360,607	540	1,361,258	110	-	478,727	281	479,118
Recycled		-	-	687,988	-	687,988	-	-	1,351,759	-	1,351,759	-	-	474,687	-	474,687
Incinerated		-	-	153	-	153	-	-	99	-	99	-	-	201	-	201
Landfilled		-	-	175	-	175	-	-	8,749	-	8,749	-	-	3,839	-	3,839
Other		87	-	-	598	685	112	-	-	540	651	110	-	-	281	391
Waste recycling rate	%	56.8	98.6	99.7	99.1	98.6	67.5	98.7	98.5	98.0	98.7	70.8	98.6	97.6	99.4	98.6

1) For POSCO Center, includes waste generated by all tenant companies.

Chemicals

Indicator	Unit	2023				2024				2025			
		Steel	Infrastructure	Rechargeable Battery Materials	Total	Steel	Infrastructure	Rechargeable Battery Materials[2]	Total[2]	Steel	Infrastructure	Rechargeable Battery Materials	Total
Hazardous chemicals used[1]	ton	3,132	9,968	5,240	18,340	2,939	4,298	4,575	11,812	2,258	1,377	5,933	9,568

1) Calculated based on usage at business sites subject to reporting through the Chemical Information Processing System.

2) Data for the applicable year have been corrected to address a clerical error.

Environmental Management

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO Holdings (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Environmental management system (ISO 14001) certification rate[1]	%	-	100	100	100	100	-	100	100	100	100	-	100	100	100	100
Energy management system (ISO 50001) certification rate[2]		-	100	100	-	100	-	100	100	-	100	-	100	100	-	100
Percentage of environment-friendly vehicles owned[3]		24.2	21.6	20.8	8.9	20.4	27.9	25.4	22.2	31.0	24.7	35.2	26.4	25.7	43.1	27.8
Non-compliance with environmental laws and regulations[4]	case	-	10	34	6	50	-	14	88	6	108	-	6	47	7	60
Number of monetary sanctions		-	8	23	3	34	-	8	81	3	92	-	2	44	7	53
Number of non-monetary administrative actions		-	3	11	3	17	-	6	7	3	16	-	4	3	-	7

1) Internally defined as business sites subject to environmental regulations such as total pollution load management and TMS installation, corresponding to Class 1 to Class 3 air/water pollutant-emitting sites.
2) Internally defined as business sites designated as entities subject to emissions trading allocation or GHG target management, or sites emitting GHGs at a comparable level.
3) Internally defined as EVs, solar-powered vehicles, hybrid vehicles, fuel cell EVs, etc. (excluding motorcycles and heavy machinery).
4) Prior-year report data have been restated to correct a clerical error.

Major Domestic Companies (Consolidated)

Social

Employment

Employees Status

Indicator		Unit	2023					2024					2025				
			POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Number of employees		persons	542	19,453	11,631	2,805	34,431	537	19,372	11,508	3,043	34,460	534	19,068	10,623	2,986	33,211
Executives		persons	46	85	89	32	252	44	83	109	30	266	44	82	83	26	235
By gender	Male	persons	44	81	86	31	242	39	81	106	29	255	41	76	80	24	221
	Female		2	4	3	1	10	5	2	3	1	11	3	6	3	2	14
	Percentage of women	%	4.3	4.7	3.4	3.1	4.0	11.4	2.4	2.8	3.3	4.1	6.8	7.3	3.6	7.7	6.0
Employees excluding executives		persons	496	19,368	11,542	2,773	34,179	493	19,289	11,399	3,013	34,194	490	18,986	10,540	2,960	32,976
By gender	Male	persons	397	18,308	9,880	2,586	31,171	387	18,213	9,675	2,810	31,085	380	17,899	8,968	2,751	29,998
	Female		99	1,060	1,662	187	3,008	106	1,076	1,724	203	3,109	110	1,087	1,572	209	2,978
	Percentage of women	%	20.0	5.5	14.4	6.7	8.8	21.5	5.6	15.1	6.7	9.1	22.4	5.7	14.9	7.1	9.0
By contract type	Permanent Employees	persons	426	18,278	8,501	2,542	29,747	420	18,133	8,673	2,829	30,055	392	17,650	7,980	2,743	28,765
	Fixed-term employees (contract workers)[1]		70	1,090	3,041	231	4,432	73	1,156	2,726	184	4,139	98	1,336	2,560	217	4,211
	Percentage of fixed-term employees (contract workers)	%	14.1	5.6	26.3	8.3	13.0	14.8	6.0	23.9	6.1	12.1	20.0	7.0	24.3	7.3	12.8
Managers[2]		persons	115	4,406	1,220	494	6,235	127	4,468	1,242	478	6,315	144	4,336	1,147	508	6,135
By gender	Male	persons	103	4,334	1,177	488	6,102	112	4,385	1,189	472	6,158	126	4,237	1,097	499	5,959
	Female		12	72	43	6	133	15	83	53	6	157	18	99	50	9	176
	Percentage of women	%	10.4	1.6	3.5	1.2	2.1	11.8	1.9	4.3	1.3	2.5	12.5	2.3	4.4	1.8	2.9

1) Include vice president-level employees.
2) Employees receiving position-holder/manager allowances.

Recruitment and Turnover

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
New hires	persons	82	1,621	2,292	671	4,666	45	1,654	2,047	503	4,249	34	1,751	1,697	138	3,620
Voluntary turnover rate	%	1.6	2.0	7.7	4.7	3.9	1.4	2.3	7.2	4.2	4.1	2.1	2.2	6.4	3.8	3.7

Major Domestic Companies (Consolidated)

Social

Education and Training

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Total training hours	hour	35,243	1,841,392	425,310	174,301	2,476,246	40,284	2,030,125	456,501	177,285	2,704,195	36,157	1,980,929	392,794	187,662	2,597,541
Average training hours per employee	hour/person	65	95	37	62	72	50	105	40	61	78	37	104	37	64	77
Total training cost	KRW million	1,240	32,571	7,856	1,804	43,471	1,838	33,227	9,512	1,916	46,493	1,675	35,408	8,907	1,773	47,763

Safety

Indicator		Unit	2023					2024					2025				
			POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total
Occupational health and safety management system (ISO 45001/KOSHA-MS) certification rate[1]		%	-	100	100	100	100	-	100	100	100	100	-	100	100	100	100
Lost Time Injury Frequency Rate (LTIFR)[2]		persons/ million hours	-	0.36	0.66	1.05	0.56	-	0.85	0.67	0.54	0.73	-	0.85	0.79	0.64	0.80
	Employee[2]		-	0.24	0.08	1.54	0.27	-	0.94	0.19	0.89	0.64	-	0.90	0.46	1.08	0.74
	Contractor[2, 3]		-	0.48	0.84	0.57	0.72	-	0.75	0.82	0.18	0.77	-	0.80	0.88	0.18	0.83
Total Recordable Injury Frequency Rate (TRIFR)[2]		persons/ million hours	0.76	1.74	1.77	1.52	1.74	-	1.88	2.15	1.44	1.99	-	2.06	1.88	2.10	1.95
	Employee		0.76	1.89	0.42	2.30	1.35	-	2.04	0.46	1.95	1.42	-	2.16	0.67	3.06	1.67
	Contractor[2, 3]		-	1.60	2.21	0.75	1.95	-	1.71	2.67	0.91	2.31	-	1.96	2.23	1.11	2.10
Fatalities	Employee	persons	-	-	-	-	-	-	-	-	-	-	-	-	1	-	1
	Contractor[2, 3]		-	-	2	-	2	-	-	5	-	5	-	2	5	-	7
Injuries	Employee[2]	persons	-	7	5	5	17	-	27	5	4	36	-	20	10	4	34
	Contractor[2, 3]		-	17	66	1	84	-	24	64	-	88	-	19	67	1	87

1) Internally defined as business sites required to establish a dedicated organization to prevent serious accidents (sites with 500 or more regular employees).
2) Prior-year report data have been restated due to changes in injury classification and clerical errors.
3) To prevent double counting, employees of Group companies are excluded from contractor employee data.

Local Communities

Indicator	Unit	2023					2024					2025				
		POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)	Steel	Infrastructure	Rechargeable Battery Materials	Total	POSCO HOLDINGS (stand-alone)[1]	Steel	Infrastructure	Rechargeable Battery Materials	Total
Social contribution expenses	KRW million	350	55,355	12,717	2,213	70,634	356	52,886	26,953	1,192	81,387	17,213	60,696	10,921	2,033	90,862

1) Includes 2025 contributions to the POSCO Education Foundation and POSCO year-end community donations

ESG Fact Book _ Steel (Consolidated)

Covers 100% of POSCO group's crude steel production entities; the reporting scope is as follows.

(1) Reporting Entities by Type

- **Integrated mill:** POSCO (Pohang Works and Gwangyang Works combined)*, PT.Krakatau POSCO (Indonesia), POSCO Zhangjiagang Stainless Steel (China), and POSCO Yamato Vina (Vietnam)
- **Re-rolling mill:** POSCO Maharashtra Steel Private Limited (India) and POSCO Thainox Public Company Limited (Thailand)

* POSCO is separately classified in the data.

(2) Reporting Entities by Year

- **2023 and 2024 (6 companies):** POSCO (Pohang Works and Gwangyang Works combined), PT.Krakatau POSCO (Indonesia), POSCO Zhangjiagang Stainless Steel (China), POSCO YAMATO-VINA (Vietnam), POSCO Maharashtra Steel Private Limited (India), and POSCO Thainox Public Company Limited (Thailand)
- **2025[1] (5 companies):** POSCO (Pohang Works and Gwangyang Works combined), PT.Krakatau POSCO (Indonesia), POSCO Yamato Vina (Vietnam), POSCO Maharashtra Steel Private Limited (India), and POSCO Thainox Public Company Limited (Thailand)

1) POSCO Zhangjiagang Stainless Steel has been excluded from the Steel consolidated reporting scope from 2025 following its divestment.

Financial Information and Crude Steel Production

Financial Information of Steel Production Entities by Year

Category	Company	Country	Assets			Sales		
			2023	2024	2025	2023	2024	2025
			KRW million	KRW million	KRW million	KRW million	KRW million	KRW million
Integrated mill	POSCO	Korea	45,825,529	45,681,401	45,038,613	38,971,567	37,556,523	35,010,837
	PT.Krakatau POSCO[1]	Indonesia	3,475,929	3,523,003	3,233,243	3,130,551	2,817,274	2,627,285
	POSCO Zhangjiagang Stainless CO.,LTD.	China	936,933	1,047,884	1,017,825	3,359,087	3,042,140	2,459,184
	POSCO Yamato Vina Steel Joint Stock Company	Vietnam	434,496	466,488	433,768	395,261	423,938	391,439
Re-rolling mill	POSCO Maharashtra Steel Private Limited	India	1,319,232	1,471,597	1,410,778	1,763,374	1,785,238	1,962,507
	POSCO Thainox Public Company Limited	Thailand	433,638	512,321	513,813	551,000	576,912	595,928
Total			52,425,757	52,702,694	51,648,040	48,170,840	46,202,025	43,047,180

1) PT.Krakatau POSCO's figures are on a consolidated basis; other entities are on a separate (non-consolidated) basis.

Crude Steel Production[1]

Company	Country	Unit	2023			2024			2025			
			Blast furnace/ Converter	Electric furnace	Total (crude steel)	Blast furnace/ Converter	Electric furnace	Total (crude steel)	Blast furnace/ Converter	Electric furnace	Total (crude steel)	Crude steel production share by country
POSCO	Korea	thousand tons	34,625	1,057	35,682	33,893	1,154	35,048	33,402	1,135	34,537	89
PT.Krakatau POSCO	Indonesia		3,005	-	3,005	2,981	-	2,981	2,934	-	2,934	8
POSCO Zhangjiagang Stainless CO.,LTD.	China		-	839	839	-	768	768	-	722	722	2
POSCO Yamato Vina Steel Joint Stock Company	Vietnam		-	416	416	-	485	485	-	450	450	1
Total			37,630	2,312	39,942	36,874	2,407	39,282	36,336	2,307	38,643	100
Percentage		%	94	6	100	94	6	100	94	6	100	-

1) Only upstream (integrated mill) entities are shown.

Steel (Consolidated)

Environmental

Climate Change

GHG Emissions

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO[1]	Integrated mill	Re-rolling mill		POSCO[1]	Integrated mill	Re-rolling mill		POSCO[1]	Integrated mill	Re-rolling mill	
Direct and indirect GHG emissions (Scope 1 & 2)[2]	tCO_2e	71,971,900	8,383,419	315,115	80,670,434	71,065,170	8,174,071	337,244	79,576,485	69,846,050	7,187,406	306,421	77,339,877
Direct emissions (Scope 1)		70,588,012	7,015,365	129,747	77,733,124	69,665,353	6,806,052	145,675	76,617,080	68,443,247	6,416,236	140,060	74,999,544
Indirect emissions (Scope 2)		1,383,895	1,368,054	185,367	2,937,316	1,399,825	1,368,018	191,568	2,959,411	1,402,809	771,170	166,361	2,340,339
GHG emissions intensity per crude steel output[3]	tCO_2e/ (t-crude steel)	2.02	1.97	-	2.02	2.03	1.93	-	2.03	2.02	2.12	-	2.04

1) Based on the Ministry of Climate, Energy and Environment's GHG Statement, emissions are truncated below the decimal point at each business site before aggregation; totals may therefore differ from the sum of the underlying figures.
2) Emissions of overseas entities have not undergone third-party verification by a GHG verification body.
3) Re-rolling mills do not produce crude steel and are therefore excluded from the calculation of intensity values.

Energy Consumption

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO[1]	Integrated mill	Re-rolling mill		POSCO[1]	Integrated mill	Re-rolling mill		POSCO[1]	Integrated mill	Re-rolling mill	
Direct and indirect energy consumption	GJ	354,002,498	38,152,644	3,268,074	395,423,216	359,241,857	37,660,228	3,435,297	400,337,382	349,766,841	29,637,670	3,462,644	382,867,155
Direct energy consumption		342,940,165	31,325,501	2,309,057	376,574,723	348,022,726	30,274,830	2,434,046	380,731,602	338,499,949	26,168,439	2,567,167	367,235,555
Natural gas		45,697,279	5,506,875	2,286,575	53,490,729	60,987,933	5,480,678	2,411,673	68,880,284	57,509,179	1,812,140	2,543,544	61,864,863
By-product gas[2]		294,489,643	25,067,682	-	319,557,325	284,088,474	24,110,656	-	308,199,130	279,431,138	23,891,015	-	303,322,153
Other fuels[3]		2,753,243	750,944	22,482	3,526,669	2,946,319	683,496	22,373	3,652,188	1,559,632	465,284	23,623	2,048,539
Indirect energy consumption		11,062,333	6,827,143	959,017	18,848,493	11,219,131	7,385,398	1,001,251	19,605,780	11,266,893	3,469,231	895,477	15,631,600
Electricity		10,837,975	5,734,501	959,017	17,531,493	10,963,428	6,044,814	1,001,251	18,009,493	10,990,432	2,527,032	895,477	14,412,940
Steam		224,358	1,092,642	-	1,317,000	255,703	1,340,584	-	1,596,287	276,461	942,199	-	1,218,660
Renewable energy consumed[4]	GJ	235	11,224	217,974	229,433	946	11,706	230,761	243,413	1,082	5,664	396,398	403,144
Energy intensity per crude steel output[5]	GJ/ (t-crude steel)	9.9	9.0	-	9.9	10.3	8.9	-	10.2	10.1	8.8	-	10.1

1) Energy consumption by source is truncated at the business-site level before aggregation; totals may therefore differ from the sum of subcategories.
2) For POSCO, coal is used as an iron ore reductant and is therefore not counted as energy consumption; the gas generated in the process is used as an energy source and counted as by-product gas.
3) Includes kerosene, gasoline, diesel, propane, etc.
4) Renewable energy generated on-site or procured and used through Green Premium, RECs, PPAs, etc.
5) Re-rolling mills do not produce crude steel and are therefore excluded from the calculation of intensity values.

Steel (Consolidated)

Environmental

Environmental Management

Pollutants

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO	Integrated mill	Re-rolling mill[1]		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
Air pollutant emissions[2, 3]	ton	55,042	13,376	-	68,418	49,363	12,700	180	62,243	53,907	10,955	124	64,986
NOx	ton	27,685	6,607	-	34,292	23,899	6,204	145	30,248	25,798	4,471	86	30,355
NOx intensity per crude steel output[4]	ton/ (Kt-crude steel)	0.78	1.55	-	0.86	0.68	1.47	-	0.77	0.75	1.32	-	0.80
SOx	ton	23,945	4,736	-	28,681	22,392	4,808	7	27,208	25,090	2,814	6	27,910
SOx intensity per crude steel output[4]	ton/ (Kt-crude steel)	0.67	1.11	-	0.72	0.64	1.14	-	0.69	0.73	0.83	-	0.74
Dust	ton	3,413	2,031	-	5,444	3,072	1,688	27.6	4,788	3,019	3,670	32	6,721

1) POSCO Maharashtra and POSCO Thainox were excluded for 2023, as their data were measured on a concentration basis (ppm); both entities comply with applicable national regulations.
2) Calculated based on emissions from sites subject to mandatory pollutant emissions disclosure. Domestic sites are based on sites subject to the Ministry of Climate, Energy and Environment's Operating Regulations for the Environmental Information Disclosure System, while overseas sites are based on sites holding government Environmental Permits.
3) Prior-year data have been restated following the finalization of 2024 government data.
4) Re-rolling mills do not produce crude steel and are therefore excluded from the calculation of intensity values.

Water

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
Water withdrawal	ton	153,645,403	15,115,560	2,051,931	170,812,894	156,026,930	14,794,159	2,032,410	172,853,499	159,022,195	9,501,665	2,230,610	170,754,470
Municipal water		-	10,825,856	2,051,931	12,877,787	-	10,666,070	2,032,410	12,698,480	-	9,501,665	2,230,610	11,732,275
Surface water		115,497,855	4,289,704	-	119,787,559	119,307,357	4,128,089	-	123,435,446	123,138,088	-	-	123,138,088
Groundwater		4,154,290	-	-	4,154,290	4,556,880	-	-	4,556,880	4,167,560	-	-	4,167,560
Desalinated water		5,044,618	-	-	5,044,618	2,992,678	-	-	2,992,678	3,051,884	-	-	3,051,884
Reused municipal wastewater		28,948,640	-	-	28,948,640	29,170,015	-	-	29,170,015	28,664,663	-	-	28,664,663
Water withdrawal in 'High' water-stress areas[1]		84,054,014	9,685,311	518,177	94,257,502	87,319,386	9,395,856	641,842	97,357,084	89,090,409	8,863,505	-	97,953,914
Water withdrawal in 'Extremely High' water-stress areas[1]		-	-	-	-	-	-	-	-	-	-	-	-
Water consumption	ton	72,416,383	11,355,436	1,697,599	85,469,418	71,802,801	10,720,508	1,693,179	84,216,488	75,768,379	6,829,937	1,825,307	84,423,623
Water consumption in 'High' water-stress areas[1]		38,181,117	7,270,732	163,845	45,615,694	37,013,437	6,674,782	302,611	43,990,830	39,431,219	6,220,989	-	45,652,208
Water consumption in 'Extremely High' water-stress areas[1]		-	-	-	-	-	-	-	-	-	-	-	-
Water intensity per crude steel output[2]	ton/ (Kt-crude steel)	2,030	2,666	-	2,140	2,049	2,533	-	2,144	2,194	2,018	-	2,226
Water discharge[3]	ton	81,229,020	3,760,124	354,332	85,343,476	84,224,129	4,123,651	339,231	88,687,011	83,253,816	2,671,728	405,303	86,330,847
Recycled/reused water	ton	40,390,660	1,669,314	750,455	42,810,429	37,206,622	1,948,296	740,501	39,895,419	39,361,100	1,813,524	801,508	41,976,132
Water reuse rate[4]	%	20.8	9.9	26.8	20.0	19.3	11.6	26.7	18.8	19.8	16.0	26.4	19.7

1) Calculated based on the WRI (World Resources Institute) Aqueduct 4.0 Water Stress Map (as of May 2026).
2) Re-rolling mills do not produce crude steel and are therefore excluded from the calculation of intensity values.
3) Sum of water discharged after internal treatment and water treated by third parties.
4) Ratio of reused water to water withdrawal.

Steel (Consolidated)

Environmental

Environmental Management

Waste

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
Waste generated	ton	19,523,970	2,247,683	76,251	21,847,904	20,203,736	2,213,506	77,695	22,494,936	19,889,975	1,869,613	85,554	21,845,141
Designated waste		108,491	464,957	65,126	638,574	106,581	496,674	66,917	670,172	113,247	397,285	74,578	585,110
Recycled		58,307	444,934	60,192	563,433	60,447	483,944	62,702	607,093	66,279	396,384	70,786	533,449
Incinerated		8,691	1,098	256	10,045	9,383	1,102	321	10,806	9,748	843	157	10,748
Landfilled		41,188	-	2,555	43,743	36,580	-	1,974	38,554	36,924	-	1,758	38,682
Other		304	18,926	2,123	21,353	171	11,628	1,920	13,719	296	58	1,877	2,231
General waste		19,415,479	1,782,726	11,125	21,209,329	20,097,155	1,716,832	10,778	21,824,765	19,776,728	1,472,328	10,976	21,260,032
Recycled		19,184,692	1,778,712	2,257	20,965,660	19,890,828	1,712,691	2,113	21,605,632	19,553,273	1,472,091	2,141	21,027,505
Incinerated		43,342	4,014	-	47,356	45,834	4,140	-	49,974	45,996	237	-	46,233
Landfilled		187,445	-	36	187,481	160,494	-	29	160,523	177,085	-	7	177,092
Other		-	-	8,832	8,832	-	-	8,636	8,636	375	-	8,828	9,203
Waste generation intensity per crude steel output[1]	ton/ (Kt-crude steel)	547.2	527.7	-	547.0	576.5	522.9	-	572.7	575.9	552.5	-	576.1
Waste recycling rate	%	98.6	98.9	81.9	98.5	98.8	99.2	83.4	98.7	98.6	99.9	85.2	98.7

1) Re-rolling mills do not produce crude steel and are excluded from intensity calculations

Environmental Management

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
Environmental management system (ISO 14001) certification rate[1]	%	100	100	100	100	100	100	100	100	100	100	100	100

1) Internally defined as sites subject to environmental regulation (e.g., total pollution-load management, TMS), i.e., Class 1–3 air/water pollutant-emitting sites.

Steel (Consolidated)

Social

Employment

Employee Status

Indicator		Unit	2023				2024				2025			
			Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
			POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
Number of employees		persons	17,985	5,030	1,323	24,338	17,919	4,982	1,289	24,190	17,643	3,292	1,275	22,210
Executives		persons	67	6	5	78	65	5	5	75	65	5	4	74
By gender	Male	persons	63	6	5	74	63	5	5	73	60	5	4	69
	Female		4	-	-	4	2	-	-	2	5	-	-	5
	Percentage of women	%	6.0	-	-	5.1	3.1	-	-	2.7	7.7	-	-	6.8
Employees excluding executives		persons	17,918	5,024	1,318	24,260	17,854	4,977	1,284	24,115	17,578	3,287	1,271	22,136
By gender	Male	persons	16,918	4,623	1,198	22,739	16,841	4,572	1,164	22,577	16,557	3,041	1,148	20,746
	Female		1,000	401	120	1,521	1,013	405	120	1,538	1,021	246	123	1,390
	Percentage of women	%	5.6	8.0	9.1	6.3	5.7	8.1	9.3	6.4	5.8	7.5	9.7	6.3
By contract type	Permanent Employees	persons	16,926	4,636	1,305	22,867	16,784	4,528	1,256	22,568	16,299	2,902	1,259	20,460
	Fixed-term employees (contract workers)[1]		992	388	13	1,393	1,070	449	28	1,547	1,279	385	12	1,676
	Percentage of fixed-term employees (contract workers)	%	5.5	7.7	1.0	5.7	6.0	9.0	2.2	6.4	7.3	11.7	0.9	7.6
Managers[2]		persons	4,043	411	189	4,643	4,094	414	189	4,697	3,979	291	197	4,467
By gender	Male	persons	3,972	368	170	4,510	4,013	369	169	4,551	3,883	269	174	4,326
	Female		71	43	19	133	81	45	20	146	96	22	23	141
	Percentage of women	%	1.8	10.5	10.1	2.9	2.0	10.9	10.6	3.1	2.4	7.6	11.7	3.2

1) Includes vice president-level employees.
2) Employees receiving position-holder/manager allowances.

Recruitment and Turnover

Indicator	Unit	2023				2024				2025			
		Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
New hires	persons	1,511	211	82	1,804	1,535	180	59	1,774	1,692	235	76	2,003
Voluntary turnover rate	%	1.9	4.5	4.9	2.6	2.3	3.2	5.3	2.6	2.1	5.8	3.7	2.8

Steel (Consolidated)

Social

Safety

Indicator		Unit	2023				2024				2025			
			Domestic	Overseas		Total	Domestic	Overseas		Total	Domestic	Overseas		Total
			POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill		POSCO	Integrated mill	Re-rolling mill	
Occupational health and safety management system (ISO 45001/KOSHA-MS) certification rate[1]		%	100	100	100	100	100	100	100	100	100	100	100	100
Lost Time Injury Frequency Rate (LTIFR)[2]		persons/ million hours	0.35	0.12	0.13	0.28	0.84	0.19	-	0.62	0.79	0.05	0.15	0.59
	Employee[2]		0.17	0.09	0.00	0.14	0.97	0.27	-	0.75	0.80	0.14	-	0.64
	Contractor[3]		0.50	0.14	0.26	0.39	0.72	0.13	-	0.51	0.78	-	0.27	0.55
Total Recordable Injury Frequency Rate (TRIFR)[2]		persons/ million hours	1.69	0.31	0.80	1.30	1.81	0.46	1.10	1.42	1.93	0.36	1.46	1.58
	Employee		1.76	0.36	0.84	1.38	1.96	0.45	1.20	1.57	1.95	0.56	1.85	1.72
	Contractor[2, 3]		1.62	0.28	0.77	1.23	1.65	0.46	1.01	1.28	1.91	0.24	1.10	1.45
Fatalities	Employee	persons	-	-	-	-	-	-	-	-	-	-	-	-
	Contractor[3]		-	-	-	-	-	-	-	-	2	-	-	2
Injuries	Employee[2]	persons	4	1	-	5	26	3	-	29	15	1	-	16
	Contractor[3]		16	2	1	19	23	2	-	25	17	-	-	17

1) Internally defined as business sites required to establish a dedicated organization to prevent serious accidents (sites with 500 or more regular employees).
2) Prior-year report data have been restated due to changes in injury classification and clerical errors.
3) To prevent double counting, employees of Group companies are excluded from contractor employee data.

Policy Book

ENVIRONMENTAL POLICY

Purpose

The purpose of this Policy is to establish a sustainable management and environmental management system, improve its ability to respond to environmental risks, and contribute to protection through cooperation among POSCO Holdings and POSCO group's all affiliates, and stakeholders.

Scope of Application

This Policy applies to POSCO Holdings. POSCO Holdings shall encourage all of POSCO group affiliates and partners to comply with this Policy or establish an equivalent policy.

Basic Principles

1. Compliance with Environmental Laws and Mitigation of Environmental Impacts

- We shall comply with international conventions and applicable laws on the environment and energy, and shall endeavor to mitigate environmental impacts throughout the entire process of development, production, use, and disposal of products.
- We shall minimize pollutant emissions by adopting best available technologies and processes for pollution prevention.

2. Response to Climate Change

- We shall establish a risk self-assessment framework in response to climate change, set achievable goals, and self-evaluate performance.
- We shall endeavor to reduce GHG emissions by reducing our dependence on fossil fuels and fossil raw materials, improving energy efficiency, and developing and using renewable energy

3. Protection of Biodiversity and Restoration of the Natural Environment

- We shall endeavor to restore the natural ecosystem and protect biodiversity by using natural resources and by-products in an efficient manner.
- In order to minimize damage to the green areas, including green areas, forests, wetlands, and oceans, we shall conduct risk assessments when constructing or expanding workplaces and shall endeavor to restore the existing natural environment through reforestation and afforestation efforts when withdrawing from work sites.

4. Raw and Subsidiary Materials and Water

- We shall reduce the amount of resources used in production by considering the resource consumption of finished products, substituting materials with renewable or low-impurity alternatives, and adopting new facilities such as water-saving devices or cleaner production technologies requiring less resource inputs.

5. Waste and Wastewater

- We shall minimize waste and wastewater generated during the production process and recycle inevitably generated waste and wastewater as much as possible. We shall also establish waste management and/or waste treatment facilities required to minimize the impact that waste and wastewater from our workplaces may have on the environment.

6. Hazardous Chemicals

- We shall systematically manage hazardous chemicals to prevent chemical accidents, such as chemical leaks or spills, and endeavor to use and release less hazardous chemicals.

Action Plans

1. Establishment of Environmental Management System

- We shall establish an environmental management system ("EMS") to assess and respond to environmental risks unique to our business activities, set specific environmental performance targets, and continually improve such targets.
- The Board of Directors and the executive management shall actively participate in the decision-making and management/supervision of the EMS, and provide ample support in both human and material resources, such as assigning dedicated working-level employees, to ensure that the EMS is fully installed and operated.
- For the operation of the EMS, we shall incorporate environment-related factors in existing policies with specific consideration of each company's business situation and, if necessary, establish and comply with specific policies, guidelines, and bylaws on specific environmental concerns such as biodiversity, forest, wetland, and climate risk.
- We shall discuss the importance of environmental protection and response to climate change with stakeholders, such as contractors, suppliers, and counterparties, and shall provide support so that they can establish their own EMS.
- The officers and department heads shall provide training to officers/employees under their supervision so that they can recognize the importance of environmental management and comprehend the EMS.

2. Response to Climate Change

- We shall integrate transition and physical risks related to climate change into company-wide risk assessments and business strategies, and document and manage such business strategies and document and manage such risk.
- We shall ensure that risks, strategies, and assessments related to climate change are properly reported to the Board of Directors and executive management.
- We shall establish and implement concrete and feasible plans to mitigate GHG emissions and achieve carbon neutral goals.
- We shall apply environmental certification and disclosure frameworks related to climate change (e.g., the TCFD), or establish a comparable reporting framework to disclose to a reasonable extent our ongoing efforts and achievements in responding to climate change.

3. Management of Production and Workplace Environment

- We shall ensure that the production and workplace environment is properly managed through processes including KPIs and other performance management indicators, education/training, establishment and management of guidelines, and internal inspections, etc.
- We shall deploy best available technologies to minimize pollutant emissions and their environmental impacts.
- We shall establish and operate environmental management manuals tailored to the specific needs of production facilities and workplaces, and continually monitor and strive to improve the environmental impact of our operating facilities.
- We shall endeavor to thoroughly assess risks and achieve a zero net environmental impact in order to protect the ecosystem and the environment when building, expanding, and closing down our workplaces.
- We shall not engage in business activities that destroy forests and wetlands, but shall pursue and implement the best available measures to mitigate the impact on the ecosystem, such as through engaging in forest and wetland restoration activities.

4. Development and Distribution of Products and Services

- We shall recognize risks and opportunities associated with the transition to a low-carbon economy, and shall expand the supply of products and by-products with reduced environmental impact and assess environmental risks during transportation and logistics, minimizing environmental impacts throughout the entire lifecycle of developing and supplying products and services.
- We shall enhance our competitiveness by developing low-carbon, eco-friendly, and new and renewable energy products.

5. Supply Chain Management and Selection and Evaluation of Suppliers

- When selecting our partners (suppliers, contractors, service providers, etc.), we shall evaluate their level of environmental management to minimize environmental impact.
- We shall provide support to suppliers and contractors so that they can establish their own EMS at a superior level and preemptively manage environmental risks throughout the entire supply chain by conducting performance evaluations regarding suppliers' environmental management levels.
- We shall procure materials and equipment in compliance with the Green Procurement Policy.

6. New Projects and M&As

- We shall review environmental management plans and conduct environmental impact assessments when reviewing new projects/investments to minimize environmental risks that may arise from such projects.
- We shall proactively identify environmental risks and develop countermeasures when reviewing M&As.

- Enacted on August 31, 2022
- Amended on June 19, 2024
- Amended on June 26, 2025

BIODIVERSITY POLICY

Purpose
The purpose of this policy is to establish a system whereby POSCO Holdings can protect and promote biodiversity while performing its business activities and establish a code of conduct and action plans in order to develop a business model that can promote sustainable growth with the natural environment.

Scope of Application
This policy applies to POSCO Holdings. POSCO Holdings shall encourage all of POSCO group's affiliates and partners to comply with this policy or establish an equivalent policy.

Code of Conduct
1. We shall shift away from a linear economy where we exploit resources to produce and use products only to eventually discard them, and move instead toward a business model based on a circular economy which is decoupled from the consumption of finite resources and promotes recycling and sustainability.
2. We shall identify the potential impact on biodiversity at each stage of our business, endeavor to prevent or minimize such impact, and in cases of damages to biodiversity, strive to recover previous levels of biodiversity through restoration, closure, etc. of affected habitats and land areas.
3. When the loss of biodiversity is inevitable, we shall endeavor to minimize the loss of biodiversity, such as creating alternative habitats in other places, and shall not operate in areas of high biodiversity value.
4. We shall designate areas where our business activities directly or indirectly affect biodiversity, monitor designated reservation areas inside and outside of workplaces and other areas of high biodiversity value, and evaluate and manage the impact on biodiversity.
5. We shall identify factors that may threaten endangered animals and plants discovered in our workplaces as well as partners' workplacesand develop strategies to protect such species.
6. We shall carry out ecosystem restoration projects in areas where our business activities directly or indirectly affect the biodiversity and disclose the process of establishing and implementing plans, local communities' participation efforts, and the results of the projects.
7. We shall actively participate in research and development using biological resources, projects to promote biodiversity and protect animals, and international initiatives related to biodiversity.

Action Plans
1. We shall establish procedures and a governance framework to ensure that biodiversity issues are continuously considered in our management strategies, decision-making processes, and long-term risk analysis. Material issues shall be reported to the Board of Directors.
2. We shall integrate biodiversity management into the Group's EMS and set goals and standards to control and monitor the EMS.

- Enacted on August 31, 2022
- Amended on June 26, 2025

GREEN PROCUREMENT POLICY

Purpose
Purpose The purpose of this policy is for POSCO Holdings to prevent the overconsumption of resources and environmental pollution in the entire process of our business activities and comply with relevant laws while implementing sustainable procurement to fulfill our social responsibilities.

Scope of Application
This policy applies to POSCO Holdings. POSCO Holdings shall encourage all of POSCO group affiliates and partners to comply with this policy or establish an equivalent policy.

Definition
Definitions of terms used in this policy are as follows.
1. "Green procurement" refers to purchasing activities where we operate purchase contracts and supply chain management in an eco-friendly manner by evaluating the environmental impact of the production, supply, distribution, and post-processing process of products which are necessary for our business activities, such as raw/subsidiary materials, office supplies, and other equipment, at the stage of procuring such products.

2. "Green products" refer to the following products.

A. Products that have received a certification for their eco-friendliness in accordance with the relevant laws and regulations of the Republic of Korea and the policies of the government and public institutions or that meet the standards for the above certifications (including green products listed below as well as those products added/extended according to changes in relevant laws and policies)
- Products that can minimize the consumption of energy and resources, GHG emissions, and pollutants under Article 66 (4) of the Framework Act on Carbon Neutrality and Green Growth for Coping with Climate Crisis and that have been certified for conformity under Article 60 (2) of the above Act
- (Eco-labeled products) Products that have been recognized for their environmental improvement by the Minister of Climate, Energy and Environment under Article 17 (1) of the Environmental Technology and Industry Support Act or products that meet the certification standards announced by the Minister of Climate, Energy and Environment under paragraph (3) of the above Article
- (Low-carbon products) Among products certified for eco-labeling under Article 18 (1) of the Environmental Technology and Industry Support Act, products with reduced GHG emissions under Article 2, Item 5 of the Framework Act on Carbon Neutrality and Green Growth for Coping with Climate Crisis in accordance with the standards determined and announced by the Minister of Climate, Energy and Environment
- (Excellent recycled products) Among products subject to quality certification of recycled products determined and announced by the Minister of Trade, Industry and Resources under Article 33 of the Act on the Promotion of Saving and Recycling of Resources and Article 15 of the Industrial Technology Innovation Promotion Act, products that have been certified or meet certification standards, or products that meet the criteria announced by the Minister of Climate, Energy and Environment through discussion with the relevant ministries

B. Products certified as eco-friendly, sustainable, low-carbon, and/or green by foreign governments in accordance with relevant certification systems comparable to those listed under A. above (e.g. EU Ecolabel, Nordic Swan, etc.)

C. Products certified as eco-friendly, sustainable, low-carbon, and/or green by internationally trusted independent certification bodies, such as LEED, OEKOTEX, Green Seal, ENERGY STAR, Cradle to Cradle, etc.

Basic Principles
1. We shall conduct effective and practicable green procurement activities that consider eco-friendliness and sustainability throughout the entire process of business activities, from the procurement of raw/subsidiary materials, manufacturing, operation, and logistics/distribution to waste treatment.

2. In order to ensure feasible and effective environmental management, we shall implement green procurement not only in purchasing materials for main business activities but also for the company-wide procurement of consumable materials such as office supplies, workplace tools, etc.

Action Plans
1. Strong Recommendation for Green Procurement
- We shall actively purchase green products and prepare support programs to ensure that green products can be considered as a priority in the process of purchasing materials, etc.
- When it is difficult to purchase green products because there is no certification system or certified product in the market, we shall purchase eco-friendly products as much as possible using available information on the impact of products on the environment, taking into consideration whether recycled raw materials are used, whether the products contain hazardous chemicals, the recyclability of products and packaging materials, and the amount of carbon generated in the manufacturing and distribution process.

2. Establishment of Green Procurement System
- In order to ensure effective implementation of green procurement and continuous improvement of effective green procurement activities, we shall establish a green procurement system whereby we can monitor the status of green procurement, discover and introduce green products and suppliers of such products, evaluate green procurement performance, and establish mid- to long-term goals.
- We shall prepare measures to share information on green procurement performance and goals with stakeholders.

3. Encourage the Supply Chain to Implement Green Procurement
- We shall encourage our affiliates, contractors, suppliers, and counterparties to implement green procurement to the extent permitted by law. In particular, we shall consider whether candidates have established and implement their own green procurement policies when selecting contractors.

- Enacted on August 31, 2022

OCCUPATIONAL SAFETY AND HEALTH POLICY

Purpose

This policy ensures that POSCO Holdings complies with domestic and international laws and standards for occupational safety and health and continuously improves the occupational safety and health management system, and ultimately create a safe working environment that is optimized for the physical and mental health and safety of workers in terms of occupational safety and health.

Scope of Application

This policy applies to POSCO Holdings and its officers/employees. POSCO Holdings shall encourage all of POSCO group's affiliates and its officers/employees, as well as its spartners and their officers/employees to comply with this policy or establish an equivalent policy.

Code of Conduct

1. Workplaces

- We shall identify hazards and risks associated with all facilities and operations of workplaces, prioritize the identified hazards and risks, and establish and implement plans to address such hazards and risks. We shall set quantified goals for performance evaluation so that hazards and risks can be managed on an ongoing basis.
- We shall establish and strictly comply with workplace safety rules and ensure that workers can work in a safe and pleasant workplace.

2. Products and Services

- We shall make safety a top priority in the process of producing and delivering goods and services to consumers.
- We shall regularly identify issues that may harm the safety of our products and services, find solutions to those issues, and set goals. We shall transparently disclose the above issues and goals to our stakeholders, including consumers.

3. Promotion of Officer/Employee Health

- We shall promote the health of our officers/employees by providing learning programs on personal health management and routines. We shall provide programs for mental health improvement and therapy/counseling in order to prevent and manage work-related stress. We shall also provide assistance to officers/employees so that they can get treatment and counseling, if necessary.

Action Plan

1. We shall evaluate hazards and risks related to occupational safety and health, establish a safety and health management system that can respond to the above hazards and risks, set specific performance goals, and endeavor to continuously improve them.
2. The Board of Directors and the executive management shall actively participate in important decision-making and management/supervision regarding the establishment and operation of the safety and health management system, and discuss with workers or workers' representatives, if necessary.
3. Executives and department heads shall recognize the importance of the safety and health of their officers/employees and provide appropriate training to them so that they can understand the safety and health management system.
4. We shall make a plan to prepare for and respond to emergencies.

- Enacted on August 31, 2022

RESPONSIBLE MINERALS POLICY

Purpose

This policy prohibits the use of conflict minerals such as tin, tantalum, tungsten, and gold ("3TGs") that have been used to fund warlords and rebel groups in African countries affected by civil wars such as the Democratic Republic of Congo and other minerals such as cobalt that are linked to human rights abuses and environmental issues during the mining process. This policy outlines POSCO Holdings' commitment to using only "responsible minerals" mined in a way that respects human rights and protects the environment without financing armed conflict, and sets out the code of conduct and action plans for achieving the above goal.

Scope of Application

This policy applies to POSCO Holdings. POSCO Holdings shall encourage all of POSCO group's affiliates and partners to comply with this policy or establish an equivalent policy. Furthermore, POSCO Holdings expects partners to encourage their partners to comply with this policy as well.

Code of Conduct

1. We shall endeavor to prevent negative impact on society and the environment by preventing human rights violations, such as child labor and forced labor, in the mining process and minimizing environmental destruction.
2. We shall disclose information on partners using minerals that cause conflict, including 3TGs and cobalt, in the Democratic Republic of Congo and neighboring countries.
3. We shall comply with regulations related to conflict minerals, including the Dodd-Frank Act of the United States and the Conflict Minerals Regulation of the EU. We shall endeavor to ensure that due diligence is conducted in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Due Diligence Guidance"), which provides a framework for detailed due diligence to identify and mitigate risks in the supply chains for 3TGs and cobalt.
4. We shall require our partners to purchase 3TGs and cobalt from smelters that meet the Responsible Minerals Assurance Process ("RMAP") standards under the Responsible Minerals Initiative ("RMI") or any other similar standards. We shall also require smelters included in POSCO group's supply chains that have failed to meet the RMAP standards to meet the above standards.

RESPONSIBLE MINERALS POLICY

Action Plans

Based on the five-step framework recommended by the OECD Due Diligence Guidelines for responsible resource procurement in consideration of human rights protection and conflict risk, we shall manage as follows so that minerals can be mined in a way that respects human rights and protects the environment:

1. Establish internal management systems capable of managing risks related to minerals mined in conflict-affected and high-risk areas ("CAHRAs")
2. Identify and evaluate risks that may arise from mining, trading, and exporting minerals in CAHRAs;
3. Establish and implement risk management systems and strategies to manage and respond to identified risks, monitor performance, and improve the management system and strategies on an ongoing basis;
4. Conduct due diligence on smelters in the supply chain located in CAHRAs, and plan and conduct independent audit, if necessary; and
5. Publicly report the results of the due diligence every year.

- Enacted on August 31, 2022

HUMAN RIGHTS MANAGEMENT POLICY

Purpose

This policy aims to ensure that POSCO Holdings complies with international human rights standards such as UN Guiding Principles on Business and Human Rights, UN Global Compact, Universal Declaration of Human Rights, and OECD Guidelines for Multinational Enterprises and implements human rights management based on respect for labor principles recommended by the International Labor Organization and ratified by the government

Scope of Application

This policy applies to POSCO Holdings and its officers/employees. POSCO Holdings shall encourage all of POSCO group's affiliates and its officers/employees as well as its partners and their officers/employees to comply with this policy or establish an equivalent policy.

Code of Conduct

1. General Principles

· We shall respect the UN Guiding Principles on Business and Human Rights and acknowledge that all human beings have the right to dignity, including the following related rights: right to life and physical safety; freedom of thought, expression, and religion; freedom of association; freedom of family life and privacy; right to food and water; freedom from torture, slavery, or forced labor; right to fair and decent working conditions; and anti-discrimination.

· To this end, we shall prevent infringement on the human rights of others and take appropriate measures to prevent and address negative impacts on human rights that may occur in the course of our business activities.

· To meet the expectations of stakeholders by fulfilling our responsibility to respect human rights, our officers/employees shall comply with the following recommendations regarding human rights management:

a. We shall comply with applicable laws and internationally recognized global human rights standards wherever we operate our business;

b. When faced with conflicts with local regulations, we shall pursue ways to comply with global human rights standards; and

c. We shall treat the risk of serious human rights violations as an important management issue of the company.

2. Major Human Rights Issues

· We shall manage human rights risks that may occur in the following areas of human rights at the company-wide level and fulfill its responsibility to respect human rights.

① Anti-discrimination

We shall not discriminate against or harass anyone on the grounds of race, nationality, gender, age, educational background, religion, region, disability, marital status, etc. We shall provide equal employment opportunities to those with appropriate qualifications and abilities to perform the duties assigned to them and respect cultural diversity.

We shall not discriminate against people on the grounds of gender and employment type.

We shall provide equal wages to workers who perform work of equal value to prevent disparities in wages and working conditions without reasonable grounds. We shall fairly evaluate officers/employees' individual capabilities and performance and systematically reflect the evaluation results to provide appropriate compensation.

② Prohibition of Forced Labor and Child Labor

We shall not coerce anyone to work against his/her free will by means including human trafficking, violence, intimidation, confinement, and other unreasonable restrictions of mental or physical liberties. We shall not predetermine damages for non-performance of labor contracts, bind workers to employment on the grounds of monetary loans, or require workers to enter into additional compulsory agreements incidental to labor contracts. In addition, we shall prohibit child labor in principle and comply with labor conditions for minors and minimum working age standards under national labor laws and international standards.

③ Guarantee of Freedom of Association and Collective Bargaining

In accordance with the basic labor rights under domestic laws and regulations and as defined by the International Labor Organization, we shall recognize workers' freedom of association and membership, including the freedom to unionize. We shall not penalize workers for joining labor unions or engaging in union activities. In addition, we shall not reject collective bargaining without reasonable grounds and shall respect and fully implement the results of collective bargaining.

④ Guarantee of Occupational Safety

Under the principle that all kinds of accidents and work-related diseases must be prevented, we shall establish a companywide health and safety policy, fully comply with international safety rules and regulations, and take appropriate measures for any identified occupational hazards.

⑤ Prevention of Workplace Harassment

We shall strive to strictly prevent any cases of employees taking advantage of their positions or relationships at work to cause unwarranted physical or mental distress to another employee or cause harm to the work environment. We shall prevent any employee from violating the human rights of others or engaging in verbal, physical, or visual behavior that is offensive to others, including sexual harassment, and create a workplace culture in which everyone is respected.

⑥ Responsible Supply Chain Management

In order to monitor and manage forced labor and violations of children's rights in our supply chain, we shall manage human rights risks of our suppliers, subcontractors, subsidiaries, and other key partners under our influence. In addition, we shall ensure fair trade with our partners based on mutual respect and equality and support partners to comply with fair trade laws and regulations.

⑦ Anti-corruption and Anti-bribery

In order to maintain fair trade in all areas, we shall comply with all domestic and international anti-bribery and anti-corruption laws and regulations, including the Improper Solicitation and Graft Act, the UN Convention against Corruption, the Foreign Corrupt Practices Act, and the Act on Combating Bribery of Foreign Public Officials in International Business Transactions.

⑧ Guarantee of Environmental Rights

We shall reduce greenhouse gas emissions by lowering the use of fossil fuels and raw materials and improving energy efficiency. In addition, we shall promote the efficient use of natural resources and by-products to support the restoration and conservation of natural ecosystems. We shall establish an environmental management system, strengthen our capacity to respond to environmental risks, and foster open communication.

HUMAN RIGHTS MANAGEMENT POLICY

⑨ Protection of Human Rights of Local Residents

If a human rights violation occurs in the local community due to the company's business activities, we shall collect opinions and endeavor to resolve such human rights issues. In addition, we shall minimize and prevent human rights risks as we may have a social and environmental impact on local residents and the region in the process of running our business. We shall also evaluate the impacts on the safety, health, food, and economic activities of the local environment and local residents and take into account protection of the local culture and biodiversity issues in the region.

⑩ Protection of Human Rights of Consumers

We shall operate a customer-centric business in which we listen to and respect our customers. We shall actively accept customers' legitimate requests and reasonable suggestions. We shall not provide products and services that threaten their safety and health based on considerations for the safety and health of customers in our business activities. We shall also protect customer-related information.

3. Establishment of Policies and Procedures

· We shall prepare the following policies and procedures to fulfill our responsibility to respect human rights.

① Implementation of appropriate policy regimes, including enactment of rules containing the company's responsibility to respect human rights

② Human rights due diligence procedures to identify, prevent, and mitigate any negative impact on human rights and inspect and investigate any activities that affect human rights

③ Procedures to remedy the negative impact on human rights that the company has had

Action Plans

1. Human Rights Management Governance

· The ESG Committee, an expert committee under the Board of Directors, shall set overall policies and directions related to human rights management and monitor the implementation of such human rights management. The ESG Office supports the ESG Committee in carrying out its duties smoothly and conducts human rights education, information disclosure, human rights due diligence, and victim remediation.

2. Human Rights Due Diligence

A. Key Considerations

· Officers/employees shall identify, prevent, and mitigate any negative impact on human rights and conduct human rights due diligence when considered necessary to fulfill their responsibilities. Such due diligence shall include identifying and evaluating any actual and potential impact on human rights, responding to problems identified, recording response activities, and communicating with stakeholders. Human rights due diligence shall consider the following:

① Include negative impacts on human rights that may be directly or indirectly triggered in the course of the Company's business activities;

② Consider the location and size of workplaces, human rights risk exposure, characteristics and features of business, and other various matters depending on the political and economic conditions and characteristics of the host country; and

③ Recognize that human rights risks gradually change as the Company's activities and business environment change, and continue to conduct due diligence.

B. How to Conduct Due Diligence

· We shall endeavor to identify and inspect any actual and potential negative impact on human rights related to their business activities at home and abroad according to the following process.

① If human rights risks are identified in major domestic and foreign workplaces, we shall conduct human rights due diligence, analyze the situation, and make improvement plans;

② In principle, due diligence shall be carried out by internal experts and, if necessary, may be conducted with the support from external experts;

③ In some cases, groups and stakeholders who may be potentially affected may be interviewed;

④ We shall identify any potential and actual impact during due diligence, share the evaluation results at the Company-wide level regarding the potential impact, take measures to prevent or mitigate such impact by carrying out relevant procedures, and endeavor to remediate and resolve any existing impact; and

⑤ We shall conduct due diligence using a checklist that identifies key elements related to human rights management.

C. Response and Follow-up

· We shall establish a response system and take follow-up actions based on findings from human rights due diligence to prevent and mitigate any negative impact on human rights.

① Establishment of Internal Response System

i We shall clarify roles and responsibilities with relevant departments to solve identified problems.

ii We shall apply internal decision-making, budget allocation, and monitoring procedures to effectively respond to the above impact.

iii We shall accurately explain the problems identified through human rights due diligence to the relevant departments and respond to the problems by managing them as important issues.

② Follow-up and Remedies

i We shall take the necessary steps to prevent or mitigate any potential or existing adverse impact on human rights.

ii In cases of unexpected negative impact on human rights despite our best policies and procedures, we, alone or in collaboration with other entities, shall endeavor to address such negative impact.

iii When we have not directly contributed to negative impacts on human rights, but the negative results are related in a complex way to our operations, production, and services through our relationship with other entities (e.g., suppliers). Despite the fact that we are not directly responsible for devising plans for systematic improvement, we shall play a certain role.

iv We shall use the influence that the company has to prevent or mitigate the negative impact on human rights, and otherwise may strive to strengthen our influence by collaborating with the relevant entities to protect human rights.

v We shall operate a grievance mechanism that shall serve as an effective remedy for potentially affected stakeholders.

D. Communication with Stakeholders

· When stakeholders raise concerns about human rights impacts, we shall take responsibility in communicating with them.

① We shall communicate responsibly and transparently with our stakeholders, including affected groups, individuals, and investors. To facilitate stakeholders' access to information, we may consider various forms of communication, such as face-to-face meetings, publication of official reports, and online channels (e.g., the company's official website and Helpline).

② We shall include actual and potential negative impacts in the official reports we publish and may consider independent verification procedures to enhance the credibility of the reports.

③ We shall provide stakeholders with information so that they can better assess whether the company is responding appropriately to specific human rights impacts.

E. Internalization and System Improvement

· Based on the results of human rights due diligence, we shall contribute to the actual improvement of human rights management through internalization of organizational culture and activities for improving systems.

① We shall carry out activities to internalize human rights management into the organizational culture by providing training on rapport-building and human rights management norms to all officers/employees and sharing successes and failures.

② We shall continue to improve the human rights management system by consulting with experts, communicating with stakeholders, and discovering areas for improvement through implementing systems.

3. Grievance Mechanism

· We shall operate a grievance mechanism for negatively affected individuals and communities so that their grievances can be promptly discussed and addressed. We shall strive for prompt and reasonable resolution through the grievance reporting center, and no disadvantageous employment measures shall be taken against reporters, victims, or cooperating persons for filing complaints, requesting investigations, or cooperating with such procedures.

· The grievance mechanism shall perform the following important functions in relation to the company's responsibility to respect human rights:

① Facilitate the identification of negative impacts on human rights and provide channels through which stakeholders directly affected or potentially affected may raise issues. They may report human rights concerns to the ESG Office or request grievance handling in person, by mail, telephone, or email.

② Collection of grievances and provision of early relief to victims in order to prevent the spread of human rights violations; and

③ Analysis of operations progress to identify and solve problems in human rights policies and procedures.

- Enacted on August 31, 2022
- Amended on June 26, 2025
- Amended on June 25, 2026

DIVERSITY, EQUITY, AND INCLUSION POLICY

Purpose

The purpose of this policy is to prevent discrimination, harassment, and sexual harassment in the workplace by improving diversity, equity, and inclusion for all officers/employees of POSCO group and to create a healthy working environment where officers/employees can reach their full potential.

Scope of Application

This policy applies to POSCO Holdings and its officers/employees. POSCO Holdings shall encourage all of POSCO group's affiliates and its officers/employees as well as its partners and their officers/employees to comply with this policy or establish an equivalent policy.

Code of Conduct

1. Diversity and Inclusion

"Diversity" means respecting the characteristics of each employee, including culture, gender, nationality, race, religion or belief, social and economic status, and abilities. "Inclusion" means enabling all officers/employees to carry out their duties with a sense of belonging to the organization for which they work so that they can reach their full potential. "Diversity and inclusion" means creating a work environment in which members of an organization respect one another without unreasonably discriminate against others. Particularly, diversity can be achieved by doing the following:

- Respect cultural diversity and maintain an inclusive work environment;
- Create an environment in which all officers/employees can contribute to the company's business operations by utilizing their abilities, experiences, and knowledge to the fullest;
- Support officers/employees to achieve their personal goals and allow them to work flexibly in terms of time, place, and method;
- Remove barriers to communication between organizations and pursue an open corporate culture that promotes open communication and mutual cooperation;
- Provide diverse networking groups where officers/employees can interact with one another;
- Recognize that some officers/employees may have difficulties in working due to physical or mental disabilities and do not alienate or exclude them from the company on the ground of their disabilities;
- Recognize that the company is a place where officers/employees from different generations, with different abilities, backgrounds, nationalities, and races, gather together and work together;
- Create an environment in which all officers/employees with different family relationships such as marital status, divorce status, and children can coexist;
- Introduce a performance-based promotion system; and
- When artificial intelligence ("AI") is used in the hiring, HR management, and training process, avoid using algorithms that may fuel prejudice against specific groups and be careful not to produce any discriminatory results.

2. Equity

"Equity" means providing equal opportunities in promotion, recruitment, and education so that officers/employees can reach their full potential. Particularly, equality can be achieved by doing the following:

- Do not discriminate against anyone on the ground of race, nationality, gender, age, educational background, religion, region, disability, marital status, or gender identity, which is irrelevant to his/her ability;
- Ensure that the company, affiliates, suppliers, and contractors comply with the principle of gender equality;
- Devise and implement a plan to promote gender balance of the company's decision-making body;
  - Analyze the gender wage gap and disclose the results every year;
  - Devise and implement a plan to promote gender balance of the company's decision-making body;
  - Ensure that female officers/employees are not discriminated against based on pregnancy, childbirth, and child rearing;
  - Ensure that in no event is an employee's personal and career development impeded because of his/her gender;
  - Provide equal working environment for equal work and work of equal value;
  - Fairly evaluate officers/employees' individual capabilities and performance and systematically reflect the evaluation results to provide appropriate compensation;
  - Ensure that equal employment opportunities are provided to those with appropriate qualifications and abilities; Treat others without prejudice based on social, cultural, or educational background; and

3. Anti-workplace Harassment

The following activities which take advantage of his/her position or relationship at work to cause physical or mental distress to another employee or cause harm to the work environment beyond the appropriate scope of workplace interactions shall be prohibited:

- Physical Harassment
- Work-related Harassment
- Mental Harassment
- Personal Harassment

4. Anti-sexual Harassment

Officers/employees are prohibited from the following: abusing their position and/or workplace context to make sexual remarks/gestures or request sexual favors and thereby making others feel sexual humiliation, disgust, etc.; penalizing a person in terms of his/her employment on the ground that he/she refuses to respond to sexual remarks/gestures or to requests for sexual favors; expressing intention to give benefits to a person on the condition that the person responds to sexual remarks/gestures or accepts requests for sexual favors.

Action Plans

- Improve diversity, equity, and inclusion; provide regular training to prevent discrimination, harassment, and sexual harassment in the workplace; and take necessary precautions.
- The executive management or the Board of Directors shall install a dedicated department responsible for monitoring implementation of this policy, receiving reports of violations, providing counselling, conducting investigations, and handling such reports. In particular, the responsible department should operate a separate team dedicated to provide counseling and reporting services regarding sexual harassment.
- Anyone who becomes aware of a violation of this policy shall report to the responsible department in person, by mail, by phone, or by email. The responsible department shall establish and operate appropriate reporting systems.
- When the responsible department becomes aware of a violation of this policy, it shall investigate the violation and, depending on the results of the investigation, take necessary measures, such as disciplinary action, transferring the offending party to another department, or providing training to prevent recurrence.
- Victims and allies shall not be subjected to disadvantages in employment or other discriminatory treatment and information related to victims' cases shall be kept strictly confidential, except as necessary for investigating or handling the case.

- Enacted on August 31, 2022

SUPPLY CHAIN POLICY

Purpose

This policy enables POSCO Holdings to promote fair trade based on mutual trust with its supply chain and partners, build a sustainable supply chain, and ultimately create an inclusive business environment where POSCO Holdings can coexist and grow together with its stakeholders.

Scope of Application

This policy applies to POSCO Holdings. POSCO Holdings shall encourage all of POSCO group's affiliates and its officers/employees as well as suppliers and partners (collectively "partners") and their officers/employees to comply with this policy or establish an equivalent policy. Furthermore, POSCO Holdings expects partners that deal directly with POSCO group to encourage their partners to comply with this policy as well.

Partner Code of Conduct

1. Human Rights

Partners shall not tolerate unlawful child labor, human trafficking, or any other form of forced labor under the UN Guiding Principles on Business and Human Rights and the International Labor Standards of the International Labor Organization. Partners shall endeavor to respect and protect the human rights, working hours, and freedom of association and collective bargaining of all workers. In addition, partners shall not discriminate against workers on the grounds of race, nationality, gender, age, educational background, religion, region, disability, marital status, or gender identity.

2. Environment

Partners shall not only comply with environmental regulations and laws but also evaluate the impact that their business activities may have on the environment and the risk that their business activities may pose to the environment. Partners shall establish an EMS to systematically manage/analyze environmental management performance throughout the entire process from product development and production to use. Partners shall endeavor to reduce GHG emissions by using less fossil fuels and fossil raw materials and improving energy efficiency and to restore the natural ecosystem and protect biodiversity by using natural resources and by-products in an efficient manner.

3. Health and Safety

Partners shall establish a company-wide health and safety policy and fully comply with safety rules at international level. Partners shall take appropriate measures to prevent deaths, injuries, and illnesses in the workplace so that they can ensure that all officers/employees are protected from accidents and work-related diseases and work in a safe and healthy environment. Partners shall place top priority on consumer safety when manufacturing products.

4. Anti-corruption

Partners shall neither engage in nor tolerate any form of corruption, graft, or improper solicitation. Partners shall comply with domestic and international anti-bribery and anticorruption laws and regulations, stick to the basics and adhere to the principles over the course of their business activities, and endeavor to establish an ethical corporate culture.

5. Fair Trade

Partners shall comply with international standards and national fair trade laws and shall not engage in unfair cartel activities with competitors, such as collusion on production, price, bidding, and market division, and unfair trade practices that may undermine fair trade. Partners shall respect the rights and properties of others, including intellectual property rights, and shall not operate business or take profits while infringing on the intellectual property rights of others. Partners shall obtain and use information of other companies, including their competitors, only through legitimate means.

6. Prevention of Money Laundering and Tax Evasion

Partners shall comply with laws for the prevention of domestic and international illegal money laundering, tax evasion, and financing of terrorism and weapons of mass destruction.

7. Avoiding Conflicts of Interest

Partners shall avoid situations that may conflict with or likely to conflict with the company's interests. Partners shall not disclose or improperly use any confidential or non-public information that they have obtained while doing business with the company.

8. Whistleblower Program

Partners shall prepare and operate a whistleblowing program that allows workers to anonymously report unethical behavior or potential violations. Partners shall investigate any report filed and take appropriate action to address any concerns.

9. Wage

Partners shall comply with all laws related to wage including minimum wage, salary, overtime work pay and deduction from salary.

Action Plans

1. Risk Management and Due Diligence of Supply Chain

- We shall identify partners' failure to comply with the basic principles of this policy and resultant risks that may undermine sustainability in the supply chain and prepare a system to manage and monitor the above risks in order to minimize any negative impacts.
- When selecting a partner, we shall check whether the candidates are complying with the Partner Code of Conduct in this policy.
- When entering into contracts with a partner in the supply chain, it shall be clearly stated in the contract that the partner shall comply with this policy and ensure that the partner includes a similar clause in its contract with its own partners.
- We may identify negative impacts on human rights, the environment, and product safety in the process of managing supply chain risks. We may conduct supply chain due diligence to the extent permitted by law, as is necessary to prevent or mitigate such risks.
- Supply chain due diligence shall include identification and evaluation of actual or potential negative impacts on the supply chain, preparation and implementation of action plans to prevent/mitigate/address negative impacts, communication with stakeholders about the process and results of due diligence, and procedures through which stakeholders can express their grievance.
- We may determine the scope of the supply chain subject to due diligence at our own discretion in consideration of expected group-wide effects. Depending on the situation, the scope of due diligence may be limited to direct contractors or be expanded to include entities further up/down the supply chain.
- We may evaluate a partner's level of implementation of this policy through supply chain risk management and due diligence.Based on the evaluation results, we may request the partner to establish and implement a plan to address and mitigate negative impacts caused by the partner's business activities. Regardless of the above, if it is determined that such negative impacts are unlikely to be mitigated due to the partner's insufficient efforts, we may suspend business with the partner.

2. Co-prosperity with Partners and Establishment of Mutually Beneficial Relationship

We shall endeavor to promote fair trade based on mutual trust with its partners and create an inclusive business environment where we can coexist and grow together with its partners.

- We shall respect the rights of its partners (intellectual property rights, property rights, etc.) and endeavor to ensure fair trade with partners based on mutual respect and equality.
- We shall share achievements with partners and pursue mutual benefits. We shall further ensure smooth communication and mutual cooperation with partners so that the latter can provide high-quality products and services.
- We shall endeavor to improve payment procedures for partners and to establish a stable supply chain by providing technical and financial support. We shall also support partners to help comply with fair trade laws and regulations.
- We shall continue to expand the scope of partners subject to our co-prosperity efforts for the promotion of mutually advantageous coexistence in the business ecosystem.

- Enacted on August 31, 2022

STAKEHOLDER ENGAGEMENT POLICY

Purpose

POSCO Holdings declares that if we pursue changes and innovations while communicating and empathizing with all stakeholders, including customers, members, and shareholders, we can ultimately increase our corporate value. This policy sets out the code of conduct and action plans to actively listen to the needs and opinions of stakeholders and communicate with them in order to promote coexistence and co-prosperity.

Scope of Application

This policy applies to POSCO Holdings and its officers/employees. POSCO Holdings shall encourage all of POSCO group's affiliates and its officers/employees as well as its partners and their officers/employees to comply with this policy or establish an equivalent policy.

Code of Conduct

1. Definition of Stakeholder

"Stakeholder" means any individual or entity that may influence a company's business activities, products, services, and decision-making or that may be affected by a company's business activities. Stakeholders can include a variety of groups, such as customers, officers/employees, shareholders, partners, local communities, governments, civic groups, and domestic/foreign investors.

2. Stakeholder Engagement and Communication

- We shall put truth, fairness, and honesty as the top priority; recognize that building a trustworthy image for its stakeholders is an immovable value; and encourage the participation of stakeholders and actively communicate with them.
- We shall objectively evaluate the positive and negative impacts that business activities may have on society and the environment from the perspective of a third party through engagement and regular communication with stakeholders. We shall further strive to reflect the demands and expectations of stakeholders regarding corporate social responsibility issues identified in our business activities.

3. Respect for and Participation of Community

- We shall respect and protect the culture and traditions of the local community. We shall also provide support to minimize the negative impact that business activities may have on the local community and the environment and to maximize the positive impact from business activities.
- We shall respect the rights of indigenous peoples in the local community based on the ILO's Convention No. 169 or the UN Declaration on the Rights of Indigenous Peoples, and endeavor to realize the social, economic, and cultural rights of indigenous peoples.

4. Community Development

We shall endeavor to lay the foundation for sustainable growth by contributing to the development of the local community and to ensure that the local community's active participation can lead to creation of social and economic value.

Action Plans

1.Establish Procedures for Stakeholder Identification, Participation and Communication

- We shall establish procedures to identify individuals or groups that are affected by or may affect our business activities and the level of such influence.
- We shall establish procedures and methods to efficiently listen to stakeholder opinions to encourage their active participation. The above procedures and methods shall include stipulations on communication channels and those responsible for their operations, frequency of collection of stakeholder opinions, and method of operation.

2. Establish Procedures for Community Protection and Participation

- Where business activities may affect the rights of local residents, we shall have procedures in place to identify and protect the rights of local residents. We shall also provide local residents with sufficient information on whether and how to carry out our project and prepare a mechanism where local residents can freely voice their opinions in advance based on the above information.
- We shall actively identify how business activities affect the issues regarding resettlement and compensation of local residents and endeavor to systematically address such issues.
- We shall start discussions with the local community from the initial stage of our business activities and endeavor to carry out our business activities through continuous discussions with the local community.

3. Community Development Initiatives

- We shall prepare community development initiatives based on discussions with stakeholders in the community. We shall further monitor the progress of the initiatives and regularly share the results with stakeholders throughout the implementation process of the initiatives.

4. Grievance Mechanism

- We shall operate a grievance mechanism for individuals and communities negatively affected by our business activities. We shall endeavor to address grievances swiftly and reasonably by using existing methods such as the Ethics Counseling Center (Helpline) and the Unethical Conduct Reporting Center (Hotline). We shall endeavor not to penalize those who file a complaint, victims, and cooperators on the ground that they apply for counseling or investigation and provide cooperation.

- Enacted on August 31, 2022
- Amended on June 19, 2024

TAX POLICY

Purpose

This policy provides the tax policies that POSCO Holdings shall comply with so that it can faithfully fulfill tax obligations and comply with tax laws in the Republic of Korea and other countries in which it operates its business

Scope of Application

This policy applies to POSCO Holdings. POSCO Holdings shall encourage all of POSCO group's affiliates and partners to comply with this policy or establish an equivalent policy.

Code of Conduct

1. Compliance with Tax Laws

We shall comply with the tax laws of the Republic of Korea and the countries in which it operates its business, and in the process, it shall consider not only the literal text of the tax laws but also the legislative purposes behind such laws.

2. Building a Transparent Relationship with Tax Authorities

We shall build a transparent relationship with the tax authorities to faithfully fulfill its tax reporting obligations, check its fulfillment of tax obligations, and closely discuss with the tax authorities when it needs clarification of tax issues in order to minimize potential risk.

3. Prohibition of Tax Avoidance

We shall not establish an offshore company in tax havens with the intention to unscrupulously minimize its tax obligations or transfer income to regions where favorable tax rates apply under tax treaties. We shall also determine transaction prices in accordance with the arm's length principle and the OECD Transfer Pricing Guidelines when transacting between affiliates. Further, we may undergo verification by an external professional organization regarding the appropriateness of prices determined as above, if necessary.

TAX POLICY

Action Plans

1. Establishment of Tax Risk Management System

We shall establish a system to monitor, evaluate, and identify tax risks in advance. We shall minimize identified risks using the risk response strategies and action plans that we have established in advance.

2. Roles and Responsibilities of the Board of Directors

The Board of Directors shall review and approve this policy and establish a tax-related organization and a risk management system to identify and respond to tax risks.

3. Use of External Specialized Agencies and Disclosure of Information

We shall receive an objective review by an independent agency on major tax-related issues and minimize tax risk with the help of an external professional agency when making important decisions, if necessary.

4. Transparent Information Disclosure

We shall transparently disclose the amount of tax we pay in the Republic of Korea and other countries in which we operate our business.

- Enacted on August 31, 2022

BOARD INDEPENDENCE AND DIVERSITY POLICY

Purpose

In order for the Board of Directors, the highest decision-making, management, and supervisory body of POSCO Holdings, to make objective, efficient, and reasonable decisions that maximize the profits of companies and shareholders and contribute to the development of stakeholders and civil society, it is important to have an independent and diverse structure. Based on the above belief, this policy aims to constitute the Board of Directors of POSCO Holdings with directors from various backgrounds, experiences, abilities, and significant independence.

Scope of Application

This Policy applies to POSCO Holdings.

Code of Conduct

1. Board Independence

- The Board of Directors shall abide by relevant laws such as the Commercial Act and the Financial Investment Services and Capital Markets Act and perform decision-making and management/supervision functions independently of the executive management, controlling shareholders, and stakeholders.
- In order for the Board of Directors to actually maintain independence and supervise and oversee the executive management, the Board of Directors shall include outside directors under the Commercial Act and other relevant laws.
- Qualifications and independence of outside directors shall be more strictly regulated than that of inside directors. Outside directors shall be independent in accordance with relevant laws and this Policy. Stronger independence requirements than the relevant laws and this Policy may be set by referring to the global standards to the extent that such requirements do not violate the relevant laws and the Articles of Incorporation.

2. Board Diversity

- The Board of Directors shall be composed of people with diverse knowledge, experiences, abilities, and gender so that they can fulfill their roles and responsibilities and make objective and reasonable decisions based on effective discussions from various perspectives.

Action Plans

1. Selection of Candidates with Expertise and Independence

A person with the ability, experience, and competency to fulfill his/her role and responsibilities as a candidate shall be recommended and selected as a candidate. More careful consideration shall be given to selecting/appointing a person who is liable for damage to corporate value and infringement of shareholders' rights and interests or those who may have a conflict of interest with the Company or shareholders as a candidate.

2. Securing Independence of Outside Directors

- Outside directors shall be particularly independent and neutral. Therefore, when appointing a person as an outside director, it shall be comprehensively reviewed whether there are any circumstances in which the person cannot actually secure his/ her independence. Persons who can neutrally and objectively perform their duties for the benefit of the company and shareholders shall be appointed as outside directors.
- Outside directors who satisfy the following requirements shall be considered independent. In addition, it shall be comprehensively considered whether an outside director is significantly related to the company.
  - A person who has not been hired as an officer/employee of the company in the last five years
  - A person who has not worked as a managing director (samgmu) of an affiliate in the last three years
  - A person whose immediate family has not served as an officer of the company or its subsidiary for the past three years
  - A person or any of his/her family members who has not received an annual salary of KRW 120 million (equivalent to USD 100,000) or more from the company in the last three years
  - A person who has not been employed by an external auditing agency of the company for the past three years
  - A person who is not an advisor or consultant to the company's executive management
  - A person who is not an officer/employee (including a person who has served as an officer/employee in the last two years) of a corporation that has signed a contract for legal and management advice with the company
  - A person who is not an executive/employee of a corporation (including a person who has served as an officer/employee in the last two year) whose total transaction with the company in the last three business years is 10% or more of the company's total assets or total sales
  - A person who is not an executive or employee of a corporation (including a person who has served as an officer/ employee in the last two year) that has signed a single transaction contract worth 10% or more of total sales with the company during the recent business year
  - Any other person who is not related to any matter decided by the Board of Directors

3. Securing Diversity of Board of Directors

- We shall promote gender equality in the Board of Directors.
- When recommending/reviewing candidates, diversity factors such as gender, nationality, age, professional ability, experience, background, race, religion, and ethnicity shall be fully considered in order to enhance the diversity of the Board of Directors.
- In order for the Board of Directors to make reasonable decisions, people with rich experience and expertise in various fields such as industry, finance, academia, law, accounting, or public sector shall be appointed as outside directors, instead of appointing them all from a single field.

- Enacted on August 31, 2022

ANTI-CORRUPTION GUIDELINES

Article 1. Purpose

The purpose of these Guidelines is to ensure that employees of POSCO Holdings (referred to as the "Company" hereinafter) comply with domestic anti-corruption laws as well as global regulations and standards (referred to as "anti-corruption laws and regulations" hereinafter).

Article 2. Scope of Application

Matters related to anti-corruption compliance shall be governed by the Guidelines. However, matters not specified in the Guidelines, shall be governed by anti-corruption laws and regulations as well as the Code of Ethics, the Code of Ethics Practice Guidelines, and other relevant regulations of the Company.

Article 3. Definition

The definitions for terms used in the Guidelines are as follows:

1. Corruption

· 'Corruption' refers to any misconduct in obtaining tangible or intangible assets - such as money, status, or opportunities - through illegal or improper means in connection with work duties, or enabling a third party to obtain such assets.

2. Public officials and others concerned parties

· 'Public officials and others concerned' include public officials of the Republic of Korea and foreign public officials (including locally stationed Korean public officials), and refer to any individual who falls under any of the following categories:
· Persons recognized as public officials under the pertinent laws of the country in which the Company is located (referred to as the 'relevant country' hereinafter);
· Persons engaged in the legislative, administrative, or judicial functions of the relevant country's government;
· Officers or employees of businesses in which the relevant country's government holds more than 50% of the capital or exercises[1] substantial control over general operations;
· Persons engaged in the work of public organizations or public institutions established for the purpose of performing public duties under the pertinent laws of the relevant country; Candidates for public office or officers/employees of political parties within the relevant country;
· Persons performing work for international public organizations;
· Any other individual subject to applicable anti-corruption laws and/or regulations.

1) This includes cases where the government of the relevant country holds decision-making authority over key management matters of an enterprise, such as the appointment and dismissal of senior executives; cases where the government of the relevant country approves the enterprise's budget or business plans in accordance with pertinent laws or its articles of incorporation; cases where the enterprise provides services funded by the government; or cases where the enterprise's profits are included in the national budget.

3. Third Parties

'Third Parties' refer to the following, regardless of their designation:
· Persons who act on behalf of the Company to perform tasks such as securing business contracts and conducting negotiations, customs clearance, permits and/or licenses, or tax matters;
· Agents, consultants, and professional advisors hired to support tasks such as securing business contracts and conducting negotiations, customs clearance, permits and licenses, or tax matters;
· Other entities doing business with the Company, partners, and joint ventures.

4. Money and Valuables

Money and Valuables include cash, items of value, and facilitation payments. Examples of 'items of value' include:
· Securities, real estate, meals, gifts and/or golfing;
· Transportation, accommodations, or expenses for such; Rights to use or receive discounts on products, facilities, and services;
· Political contributions and charitable donations;
· Assumption or forgiveness of debts, employment offers (including internships), granting of interests, and/or other tangible or intangible economic assets.

5. Facilitation Payments

Facilitation payments involve the act of providing or expressing the intent to provide small amounts of money or other items of value to public officials engaged in routine or repetitive duties for the purpose of expediting their legitimate official actions. Common examples of such duties include:
· Receiving and processing administrative documents, such as visas;
· Customs clearance related to the transport of goods, including portering;
· Connection of telephone lines, supply of electricity and water.

Article 4. Organization, Responsibilities, and Authorities

1. Dedicated Anti-corruption Organization

The department in charge of ethical management shall serve as the dedicated organization overseeing anti-corruption matters. The department may seek assistance from other departments to ensure effective execution of its duties.

2. Dedicated Anti-corruption Organization for Overseas Operations

To effectively perform anti-corruption tasks at overseas operations, a separate dedicated anti-corruption organization may be established for its associated business duties. In such cases, the organization shall serve as a dedicated anti-corruption organization for overseas operations in place of the department responsible for ethical management.

Article 5. Basic Principles

1. Domestic Anti-corruption Laws and Regulations

Key domestic (Republic of Korea) anti-corruption laws include the Criminal Act, the Improper Solicitation and Graft Act (referred to as the 'Anti-Graft Act' hereinafter), and the Act on Combating Bribery of Foreign Public Officials in International Business Transactions (referred to as the "Anti-Bribery Act for Foreign Public Officials" hereinafter). The bribery provisions of the Criminal Act prohibit the offering of bribes to Korean public officials or arbitrators. The Anti-Graft Act prohibits unsought solicitations and the provision of money or valuables to the nations' public officials and/or other concerned parties. The Anti-Bribery Act for Foreign Public Officials prohibits the act of offering bribes to foreign public officials in connection with international business transactions and stipulates the necessary measures to implement the OECD Anti-Bribery Convention.

2. Global Anti-corruption Laws and Standards

· Major global anti-corruption laws and standards include the U.S. FCPA (Foreign Corrupt Practices Act), the UK Bribery Act, the OECD Anti-Bribery Convention, and the UN Global Compact.
· The FCPA prohibits companies listed on U.S. stock exchanges or other bodies from offering bribes to public officials in countries other than the US and stipulates requirements for internal controls, including accurate bookkeeping and record management.
· The Bribery Act prohibits companies in the UK or companies doing business in the UK from offering bribes to foreign public officials or business partners.
· The OECD Anti-Bribery Convention is the first international convention to criminalize the act of bribing foreign public officials.
· The UN Global Compact stipulates appropriate response to all forms of corruption including corporate bribery.

3. Obligation to comply with anti-corruption laws

Employees must comply not only with the aforementioned anti-corruption laws and regulations, but also with any and all domestic or international anti-corruption laws that criminalize the direct or indirect offering of bribes to public officials, including local anti-corruption laws in the countries where the Company operates.
Even acts carried out in the name of social or business customs, are subject to penalty if they violate anti-corruption laws or local regulations. In cases where there is a conflict among domestic or international anti-corruption laws, local regulations, the Guidelines, the Code of Ethics, or other company regulations, the strictest standard shall apply.

Article 6. Restrictions on Offering and Receiving Money or Valuables

Employees shall not offer money or items of value to public officials or other relevant parties in connection with entertainment or conveniences with the inappropriate intent of gaining business advantage. However, business-related entertainment and conveniences needed for purposes such as product promotion, contract execution, or enhanced mutual understanding related to business may be exchanged within the customary boundaries, provided specific conditions are met (as follows): Specific compliance requirements shall follow the Code of Ethics Practice Guidelines:

ANTI-CORRUPTION GUIDELINES

· Business-related entertainment and conveniences must be lawful in the relevant country.
· The extent of such entertainment and conveniences must fall within the range of customary norms.
· The instances of such business-related entertainment and conveniences to any one public official within a given period are limited.
· Expense reports must be accurately recorded in the Company's books and records.

1. Meals, Gifts, and Other Offerings

When employees host meals, bestow gifts or provide other such offerings to public officials or officeholders to express a gesture of goodwill or courtesy or to promote friendly relations, they must comply with the following:

· Meals, gifts and the like must be of modest value relative to the recipient's salary level.
· Meals, gifts, and the like must be offered only when there is a clear and legitimate purpose, at an appropriate time, and in a lawful and proper setting.
· The monetary value of such meals and gifts must comply with applicable domestic and international laws as well as the Code of Ethics and the Code of Ethics Practice Guidelines.

2. Provision of Conveniences

In providing conveniences to public officials and others concerned, employees must adhere to certain codes of conduct (listed below): Specific requirements are set forth in the Code of Ethics Practice Guidelines:

· Employees must not offer or accept transportation, accommodations, or similar conveniences that exceed customary boundaries. However, conveniences uniformly provided to all attendees at official events related to work duties are excluded.
· Such conveniences must be reasonably related to product or service promotion, demonstrations or explanations, or the execution or fulfillment of contracts, either directly or indirectly.
· Costs incurred for providing conveniences must not be paid to public officials, but directly to the service providers offering the conveniences such as airlines and hotels.

3. Facilitation Payments

Employees are strictly prohibited from providing any form of facilitation payments to public officials and others concerned.

Article 7. Matters Related to Third Parties

Anti-corruption laws and regulations prohibit third parties from offering money or valuables, as defined in Article 6 of the Guidelines to public officials and other concerned parties. This applies to conducting business through third parties, and the following procedures must be observed to ensure third parties abide by applicable anti-corruption laws and regulations as well as the Guidelines.

1. Operational Procedures

Employees must take appropriate measures - such as preliminary due diligence and monitoring - based on potential anti-corruption risks posed by a specific third party. Procedures related to third parties must follow the provisions below, with further details governed by the [Third Party Transaction Management Process Guidelines].

2. Before Contract Execution

Prior to entering into a contract with a third party, risk assessments should be conducted in accordance with the Third Party Transaction Management Process Guidelines by taking into account the type of contract being entered into and any associated and identified indicators necessitating the exercise of caution. Depending on the risk assessment results, necessary procedures should be implemented, including preliminary due diligence.

3. Contract Execution

When executing a contract with a third party, an 'anti-corruption pledge' as stipulated in the Third Party Transaction Management Process Guidelines should be obtained based on risk assessment results, and the contract must include the terms set forth in the standard contract.

4. After Contract Execution

After a contract is signed, continuous monitoring should be conducted to ensure compliance with anti-corruption laws and regulations, which may include additional due diligence, audits, and training. Any employee concerned about potential non-compliance with anti-corruption laws and regulations in relation to the third party's performance of duties must immediately consult the designated department. Additionally, if any employee is found to be in violation by a third party or discovers themselves to be in such a violation, they must promptly report it to the designated department so that appropriate action can be taken, such as corrective measures or contract termination.

Accounting Records and Management

Employees must retain invoices, receipts, and/or other related evidential documentation from business activities and ensure it is all properly accounted for. Retention of assets or incurrence of expenditures not recorded in the books is strictly prohibited. In addition to maintaining books and records, all business activities must follow proper procedures under the Company's internal control of financial reporting system in accordance with the Internal Accounting Management Regulations.

Article 8. Anti-Corruption Compliance Training

1. Regular Training

The dedicated anti-corruption organization must conduct regular training sessions to ensure that employees fully understand anti-corruption laws and regulations and the Company's anti-corruption policies.

2. Special Training

The dedicated anti-corruption organization may conduct ad-hoc special training for employees at business sites where anti-corruption issues have previously occurred or where the risk of future occurrences is assessed to be high. If an overseas business site that has established a separate anti-corruption organization pursuant to Article 4.2 of the Guidelines becomes subject to special training, that organization may conduct special training for employees at the overseas business site.

3. Training Methods

Training may be conducted either in person or online, using the most appropriate format.

Article 9. Assessment and Inspection of Anti-Corruption Risks

The dedicated anti-corruption organization, in cooperation with relevant departments, must regularly review non-compliance with anti-corruption laws and company regulations including the Guidelines. If deemed significant, the results should be reported to the Board of Directors and the CEO. If any violations are discovered, appropriate measures must be taken in accordance with the Guidelines and company regulations. Additionally, improvement measures must be developed and implemented to prevent recurrence of such violations. The Board of Directors and the CEO must take necessary actions to prevent the violations of anti-corruption laws and company regulations including the Guidelines. They must do their utmost to ensure company-wide support for any matters requested by the dedicated anti-corruption organization.

Article 10. Response Procedures for Anti-Corruption Issues

The legal affairs department is responsible for responding to any inquiries or investigations by domestic or foreign government authorities (referred to as 'government inquiries or investigations' hereinafter) related to actual or suspected acts of corruption involving the Company or its employees. Any employee who has become aware of a government inquiry or investigation that has either taken place or is about to take place, must report it immediately to the legal affairs department. In the event that a government inquiry or investigation is initiated, all relevant employees must fully cooperate. Any response or provision of materials must be preceded by consultations with the legal affairs department.

Article 11. Reporting and Whistleblower Protection

1. Reporting Obligations and Methods

Employees who become involved in, or aware of, any situation that constitutes or is suspected to constitute a violation of anti-corruption laws and regulations or Company bylaws, including these Guidelines, whether committed by self, other, or a third party, shall immediately report such matter to the dedicated anti-corruption organization.

Failure to fulfill the above reporting obligation on the part of employees may result in referral to the HR Committee pursuant to the Whistleblower Rewards and Immunity Guidelines. The methods for filing reports and notifying audit results (if requested by the whistleblower) shall follow the procedures stipulated in the Whistleblower Rewards and Immunity Guidelines.

ANTI-CORRUPTION GUIDELINES

2. Investigation Procedures

Upon receiving a report under Item 1, the dedicated anti-corruption organization must immediately investigate the matter in accordance with the internal audit guidelines and take necessary actions such as referring the case to disciplinary measures.

3. Protection and safeguarding of whistleblower identity

Matters related to the protection and safeguarding of a whistleblower's identity shall be handled in accordance with the whistleblower reward and immunity guidelines.

4. Good faith obligation of whistleblowers

A whistleblower is not protected under these Guidelines if they report for an improper purpose or report despite knowing, or being able to know, that the report is false. In such cases, the dedicated anti-corruption organization may request disciplinary action against the whistleblower in accordance with the Whistleblower Rewards and Immunity Guidelines.

Article 12. Penalties

The dedicated anti-corruption organization shall investigate employees who violate anti-corruption laws and regulations or company regulations including the Guidelines, and take appropriate action in accordance with the internal audit guidelines Aside from any disciplinary measures taken under the internal audit guideline, the Company may seek compensation from employees for any damages incurred as a result of their violation of anti-corruption laws and regulations or company regulations including the Guidelines. The Guidelines shall take effect from October 25, 2024. The Company bears no responsibility for any civil or criminal liabilities incurred by employees when found in violation of anti-corruption laws and regulations or company regulations (including the Guidelines).

Supplementary Provisions

① The Guidelines shall take effect from October 25, 2024.
② Separate standards may be established as necessary to ensure the efficient implementation of the Guidelines.
③ The Company may revise or amend the Guidelines as necessary in consultation with the dedicated anti-corruption organization with regards to its adoption and enforcement.
④ Any matters not specified in the Guidelines or any questions regarding their interpretation shall be referred to the dedicated anti-corruption organization, and its interpretation shall prevail.

DATA PROTECTION AND PRIVACY POLICY

Purpose

The purpose of this policy is to protect POSCO Holdings' information assets safely and effectively and to set out the compliance requirements that officers/employees shall comply with in order to protect the personal information of customers who use POSCO Holdings' services, officers/employees, and contractors.

Scope of Application

The purpose of this policy is to protect POSCO Holdings' information assets safely and effectively and to set out the compliance requirements that officers/employees shall comply with in order to protect the personal information of customers who use POSCO Holdings' services, officers/employees, and contractors.

Code of Conduct

- We shall make our best effort to secure and maintain global competitiveness by complying with international standards and domestic/foreign information protection laws and protecting information assets such as core technologies and human resources, which are the source of our competitiveness.
- Officers/employees shall recognize that they are the subject of information protection and regularly participate in information protection education and training in order to improve their level of information protection.
- Officers/employees shall ensure that they protect information on a daily basis and establish a corporate culture on information protection.
- The purpose of collecting personal information shall be clearly specified when the information is collected, and the data controller shall process personal information only to the extent directly necessary to achieve such specified purpose.
- We shall use personal information within the scope of the purpose for which it was collected and select methods that can minimize the infringement of privacy of information principals.

Action Plans

1. Information Security Management System

- We shall ensure the stable operation of information systems and establish and operate an information protection management system to minimize industrial losses that may be caused by security accidents.
- We shall establish and operate procedures to control security risks and monitor and review information protection activities.
- We shall establish methods and standards to identify and assess risks to key information assets and regularly conduct risk assessments.
- We shall provide regular training to all officers/employees and establish a regular management and inspection system to ensure the effectiveness of information security.

2. Personal Information Protection Measures

- We shall prepare protective measures for each stage of processing, including collection, storage, use, provision, and destruction of personal information, in order to protect privacy, freedom, and rights of information principals throughout the above stages.
- We shall manage personal information safely through appropriate technical, administrative, and physical protection measures that are appropriate to the degree of risk and possibility of infringement of the rights of information principals.
- We shall generally disclose matters related to the processing of personal information, such as the personal information processing policy. We shall also prepare reasonable procedures to ensure that the rights of information principals, such as the right to request access to their information, are guaranteed.
- The department in charge of personal information shall provide training on personal information protection to raise awareness of personal information handlers, including officers/employees, and to prevent personal information from being misused, abused, and leaked.

3. Role of the Information Protection and Personal Information Protection Officer

- The information protection and personal information protection officer shall oversee the information protection policy and personal information protection policy. The above officer shall also establish and manage a management system.
- The competent department shall monitor the implementation of information protection and personal information policies and address vulnerabilities.

4. Reporting and Disciplinary Measures

- Officers/Employees shall immediately report security incidents to the officer or department head in charge security.
- The company shall establish violation standards and operating standards for violations of information protection and personal information protection. The company may discipline officers/employees based on such standards.

- Enacted on August 31, 2022

CODE OF ETHICS

I. Ethics Charter

POSCO group aspires to become a trusted and respected enterprise by deeply understanding that ethical management is the greatest value we must uphold in order to co-exist and co-prosper with our many stakeholders as a member of society.

Members of the POSCO family must comply with laws and ethics based on the ethical management philosophy of "doing the right thing in the right way," while also seeking to achieve Integrity, Respect, and Mutual Empathy and establishing an ethical corporate culture in business activities that cover all the basics and comply with the rules.

At the employee level, we must pursue individual growth and company success by achieving a work-life balance, and create a positive work environment by establishing a corporate culture of mutual respect. We must fulfill our duty to respect everyone as human beings and to respect the human rights universally pursued by human society.

For our customers, we must understand that our future depends on customer trust and success. We must respect the customer voice at all times and create value that promotes customer prosperity.

For our shareholders, we must enhance shareholder value by making fair profits through transparent decision making and efficient business activity.

With our business partners, we must establish a fair trading system based on mutual trust and strengthen our corporate ecosystem in which we co-exist with our business partners through mutual growth.

At the community level, we must contribute to the development of society by fulfilling our duties and obligations. We must be deeply aware of the importance of environmental issues and do our best to protect the environment in all of our business activities.

POSCO family members must always be aware of the fact that our actions are directly linked to our self-respect as well as corporate value and reputation.

We pledge to comply with the Code of Conduct and to ensure that ethics and integrity are at the heart of our culture and business operations.

July 2024

1) All employees of POSCO Holdings and its subsidiaries

II. Ethical Principles

1. Roles and responsibilities of all employees

- We comply with relevant laws and company regulations and guidelines anywhere in the world where POSCO Holdings conducts business.
- We endeavor to maintain our dignity as employees and protect our corporate reputation.
- We make our best efforts to establish an ethical culture by taking responsibility for practicing ethical behavior.
- We report to or consult an authority figure or the department in charge of ethical management[2] immediately upon becoming aware of the fact that a situation faced or an action performed by us or another person violates or is likely to violate the Code of Ethics.
- We fully cooperate with investigations conducted by the department in charge of ethical management regarding matters that are likely to violate the Code of Ethics.
- We do not retaliate against informants or individuals who participate in an investigation in relation to Code of Ethics violations.
- We are aware of the fact that by violating the Code of Ethics, soliciting another person to violate the Code of Ethics, failing to report a Code of Ethics violation or cooperate with an investigation, or taking retaliatory action against an informant or individual participating in an investigation, we may become subject to disciplinary action as appropriate. In particular, we are aware that there is zero tolerance for the four major ethical violations[3]: acceptance of bribery, misappropriation, fabrication of information, and sexual misconduct.

2) In accordance with guidelines on roles and responsibilities

3) Acceptance of bribery: Accepting money or goods beyond a socially acceptable amountfrom a stakeholder Misappropriation: Taking unlawful possession of company funds or assets Fabrication of information: Falsifying, concealing, or distributing business-related information in a mannerthat contradicts the truth Sexual misconduct: Conductthat causes distress through sexual harassment or sexual assault

2. Special Responsibilities of Executives and Authority Figures

Executives and authority figures have the responsibility to set an example of ethical compliance and prevent ethical misconduct among staff members. To this end, they must be aware of the following principles and put them to practice:

- When the company's profits and ethics are in conflict, you have a duty to prioritize ethics in your operational and administrative decision making.
- You must exemplify ethical conduct in your work and fulfill your duty as an internal and external role model.
- You must train and guide staff members to understand the provisions of the Code of Ethics and Practice Guidelines and the importance of compliance.
- You must routinely examine your teams for ethical misconduct and proactively prevent unethical behavior that is likely to occur by identifying the causes, improving processes, and taking other measures.
- foster an organizational atmosphere that promotes and supports ethically correct behavior where staff members can speak up without worrying about disadvantages;
- report to or consult the department responsible for Ethical Management immediately upon becoming aware of the fact that a staff member has violated this Code of Ethics; and
- bear unlimited liability for any ethical misconduct they have engaged in, and supervisory liability for the ethical misconduct of a subordinate employee.

III. Code of Conduct

1. Compliance with basic ethics and relevant laws

We do not seek personal gain.

- We do not put work-related pressure, issue instructions, or solicit favors that conflict with company interests in order to seek personal gain or undue gain for another person.
- All Company funds and assets must only be used for work-related purposes and cannot be used to promote personal interests in any manner.
- We respect the political rights and preferences of individuals while maintaining the political neutrality of the workplace. We do not use company funds, personnel, facilities, etc. for political purposes.

We protect Company information and assets.

- We understand the importance of the Company's confidential information and intellectual property and keep them well protected.
- We do not distort information or distribute false information.

We practice fair competition and trading.

- We establish fair and transparent trading procedures in accordance with international standards and national fair trade laws. To maintain a fair trading system, we comply with domestic and foreign anti-corruption laws and standards including the UN Convention Against Corruption, the FCPA, the Act on Combating Bribery of Foreign Public Officials in International Business Transactions, and the Improper Solicitation and Graft Act.
- We do not force business partners or suppliers to agree to unreasonable working conditions or engage in disadvantageous activities.

2. Developing a Culture of Trust and Human Respect

We foster a wholesome organizational culture.

- We pursue both personal growth and company success by achieving a work-life balance.
- Employees create an organizational atmosphere of mutual cooperation through open communication based on trust.

We provide equal opportunities.

- We provide equal employment opportunities to all individuals with the required skills and qualifications.
- We provide equal opportunities for skill development and self-improvement. Individuals are remunerated in an appropriate manner based on fair evaluations of their skills and achievements.
- We foster a wholesome organizational atmosphere that celebrates employees who create meaningful outcomes regardless of their regional, academic, or other background.

CODE OF ETHICS

We protect and respect human rights.

- We support the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and other internationally recognized human rights standards. We endeavor to avoid infringing human rights in the process of conducting business activities.
- We respect each employee as an individual. We do not engage in acts that may defame an employee or undermine human dignity such as verbal or physical abuse, bullying, and intimidation.
- We ensure proper working conditions by maintaining reasonable working hours and ensuring that no work is performed involuntarily by emotional or physical force.
- We do not discriminate against individuals on the grounds of ethnicity, nationality, gender, age, academic background, religion, regional background, disability, marital status, or sexual identity.

3. Realizing Customer Value

We commit to customer satisfaction.

- We listen to and respect customer voice.
- We welcome our customer's valid requests and thoughtful suggestions, and prioritize to incorporate them to our business activities.

We create customer value.

- We fulfill customer needs and expectations by providing the best products through technological advancement.
- We respect our customer's culture and customs.

We build customer trust.

- Customer safety and well-being are given utmost consideration in our business activities. Products or services that may pose a threat to safety and health are not offered.
- We protect customer information and provide customers with accurate and timely information.

4. Good Faith Toward Investors

We fulfill our obligations to investors.

- We strive to increase corporate value and shareholder value at the same time by creating profit through transparent decision making and efficient business activities.
- We respect shareholders' fair suggestions and endeavor to build mutual trust.

We communicate transparently with investors.

- We provide key business information in a timely, fair, and faithful manner to facilitate investor decision-making.
- Our financial information is calculated through suitable processes and controls based on accurate transaction figures. All financial documents are prepared in accordance with Generally Accepted Accounting Principles.

5. Co-prosperity with Suppliers

We build mutual trust with suppliers.

- We ensure fairness in our dealings with our suppliers through mutual respect and equal partnerships.
- Vendors are required to demonstrate a sense of responsibility before they are chosen as a supplier. We support our suppliers to maintain compliance with laws and regulations associated with workplace safety, employee human rights, and fair trade.

We pursue co-prosperity with suppliers.

- We seek mutual gains by sharing our outcomes with our suppliers.
- We support our suppliers to provide high quality products and services through effective communication and mutual cooperation.
- We aim to develop partnerships with our suppliers by providing fair opportunities and ensuring equitable terms of trade.

6. Social and environmental responsibility

We contribute to the development of the nation and society.

- We strive to create and maintain stable jobs and to fulfill tax obligations.
- We actively participate in volunteering, disaster relief, and other activities to serve the community. We contribute to the sound development of society through our pro bono involvement in such fields as culture, arts, sports, and academia.
- We endeavor to build community trust in our company by providing support to improve the quality of life of local residents and strengthen the joys of life.

We commit to environmental protection and ecosystem conservation.

- We are deeply aware of the importance of environmental issues. We comply with domestic and foreign environment-related laws and strive to improve the environmental impact at all stages of the product life cycle, including development, production, and use.
- We do our best to minimize pollutant emissions by introducing environmentally friendly production processes and by adopting the best available technologies to prevent environmental pollution.
- We endeavor to restore natural ecosystems and conserve biodiversity by making efficient use of natural resources and by-products.

Addendum

① Specific standards for implementation and the necessary details may be separately prescribed in the Code of Ethics Practice Guidelines.
② This Code of Ethics was amended and takes effect as of July 8, 2024.
③ Matters not specified in the Code of Ethics and differences of opinion in interpretation shall be interpreted and determined by the department in charge of ethical management.
④ The department in charge of ethical management may amend the Code of Ethics when necessary, and matters deemed important by the head of the department in charge of ethical management shall be amended with approval from the CEO.
⑤ The Code of Ethics forms the basis for ethical management practices and takes precedence over other Company regulations.

CODE OF ETHICS PRACTICE GUIDELINES

CHAPTER I. GENERAL PROVISIONS

Article 1: Purpose

The purpose of these Practice Guidelines is to provide a frame of reference for making decisions and taking action in ethical dilemma situations that may arise during the course of work so that POSCO Holdings employees understand and apply the Code of Ethics correctly.

Article 2 (Scope)

These Guidelines apply to the Company and all employees.

Article 3 (Principle of Application)

Employees shall make decisions and take action based on the Code of Ethics and these Practice Guidelines when faced with an ethical dilemma situation in relation to work. However, if a frame of reference is not clearly prescribed herein, employees shall make decisions and take action according to the following decision-making principles. Employees who are not confident in their judgment shall consult the leader of the organization or the department in charge of ethical management.

<Decision-making Principles>

Lawfulness: Is my action likely to be interpreted as a violation of the law, rules, regulations or company Codes?
Transparency: Can I disclose my decision-making process and the relevant details?
Rationality: Am I making the best possible choice for the Company and individuals?

1) In accordance with guidelines on roles and responsibilities.

CHAPTER II. THE CODE OF ETHICS IN PRACTICE

1. Restrictions on the provision and acceptance of valuables

- "Valuables" means money (cash, gift certificates, vouchers, etc.), goods, and other articles that may bring about financial gain.
- Valuables shall not be provided to or solicited or accepted from stakeholders for any reason. However, exceptions shall be made in the following circumstances:
  - Marketing or promotional gifts valued at or less than KRW 50,000 or up to KRW 150,000 for agricultural, marine, and processed goods (including ornamental plants)
  - Memorabilia bearing the company logo of a stakeholder and memorabilia routinely offered to attendees at stakeholder-organized events, not exceeding KRW 50,000.
- Employees shall not solicit or accept gifts from foreign entities during international business trips.
- Valuables that are unanticipated and accepted due to unavoidable circumstances shall be returned, or if this is impracticable, report to the department in charge of ethical management.
- Employees who earn income (e.g., lecture fees) from external speaking opportunities using his/her work-related knowledge or position at POSCO Holdings shall donate 50% of the earnings.

2. Principles and restrictions concerning hospitality

- "Hospitality" means various activities that facilitate business-related gatherings and interactions, such as meals, social drinks, golf, performances, and entertainment.
- Hospitality in excess of KRW 100,000 per person shall not be offered to or accepted from stakeholders. If it is necessary to offer or accept hospitality in excess of KRW 100,000 per person in relation to work, prior approval shall be obtained from the head of the department. Hospitality in excess of KRW 100,000 per person that has been offered or accepted due to unavoidable circumstances shall be reported to the department in charge of ethical management.
- Food worth up to KRW 50,000 per person may be provided to public officials, journalists, teachers, and other persons subject to the Improper Solicitation and Graft Act to facilitate work execution or for social, ceremonial, or other legitimate purposes.

3. Principles and Restrictions concerning Convenience

- "Convenience" means benefits such as transportation, accommodation facilities, sightseeing, event support, etc. provided by or to a stakeholder[2].
- The provision or acceptance of transportation, accommodation facilities, or other convenience beyond a generally acceptable level[3] is prohibited. However, this shall not include conveniences routinely provided to all attendees at an event, etc.
- A convenience in excess of the permitted range that has been offered or accepted due to unavoidable circumstances shall be reported to the department in charge of ethical management.

2) "Stakeholders" refer to employees, customers, business partners, operating companies, suppliers, domestic and foreign public institutions, and international organizations (including their employees) that may directly or indirectly affect or be affected by rights or interests in relation to one's duties.
3) "Generally accepted level" means a level that satisfies the following requirements:
① The benefit is at an acceptable level based on reasonable common sense and social norms, is justifiable when disclosed, in no way affects the fair handling of affairs, and does not pose a burden on either party;
② The benefit is appropriate not only in terms of cost but also with respect to the location, purpose, method, count, frequency, timing, recipient, content, and social ethics and conventions (customs).
③ There is no reciprocity regardless of amount;
④ The benefit complies with the Improper Solicitation and Graft Act and other relevant domestic and foreign laws. In the event of a conflict in the interpretation of laws, the higher-order law shall take precedence; and
⑤ The generally acceptable level may vary depending on factors such as the exact circumstances, nature of the work, and job position.

4. Principles and Restrictions concerning Congratulatory and Condolence Money

- Employees shall not notify stakeholders of their own family events or those of their colleagues. Informing a stakeholder through a third party shall be construed as a notification made by the employee concerned.
- However, employees may inform each other of their family events. Use of the Company's congratulations and condolences channel is advised. For the purpose of family event announcements, the scope of relatives shall be limited to immediate family members, namely the parents (or grandparents if the parents are already deceased) and children of employees and their spouses. Congratulations and condolence money between employees shall be at a generally acceptable level.
- The maximum limit for congratulations or condolence money paid to an external stakeholder shall be KRW 100,000, including floral wreaths or arrangements. However, congratulations or condolence money paid to a person subject to the Improper Solicitation and Graft Act shall not exceed KRW 50,000, excluding floral wreaths or arrangements.
- Congratulations and condolence money from external stakeholders shall not be accepted under any circumstance. Congratulations or condolence money that has been accepted due to unavoidable circumstances shall be returned or donated to the department in charge of ethical management.
- Employees shall submit the relevant information, such as proof of return of congratulations or condolence money accepted from a stakeholder, when requested by the department in charge of ethical management.
- Condolence flowers from stakeholders shall not be accepted, and those that are accepted due to unavoidable circumstances shall not be displayed.

5. Restrictions concerning Solicitations and Recommendations

- Employees shall not make solicitations or recommendations through an internal acquaintance or an external party regarding the following. If an employee has received a solicitation or recommendation, he/she shall register it in the "Clean POSCO System."
  - Requests for preferential treatment regarding various contracts, such as equipment/materials purchases;
  - Requests for favorable and preferential treatment regarding personnel decisions such as hiring, promotions, rewards and punishments, and transfer of positions;
  - Requests for excessive convenience, preferential treatment, etc. outside of usual procedures;
  - Requests to neglect management and supervision tasks such as inspections and tests.
- Employees shall not unlawfully solicit favors directly or through a third party in relation to duties subject to the Improper Solicitation and Graft Act.

6. Restrictions concerning Monetary Transactions

- Employees shall not engage in cash loans, loan guarantees, name lending, or other monetary transactions with stakeholders.
- An employee who has engaged in a monetary transaction with a stakeholder due to a personal connection shall report it to the department in charge of ethical management.

7. Restrictions concerning Event Sponsorship

- Sponsorships from stakeholders shall not be accepted for events funded by the Company, such as department events or club activities.
- The acceptance of vehicles, venues, services, or other conveniences required for an event shall be construed as acceptance of sponsorships.
- A sponsorship that has been accepted due to unavoidable circumstances shall be reported to the department in charge of ethical management.

CODE OF ETHICS PRACTICE GUIDELINES

8. Principles concerning the Use and Protection of Company Assets

- The Company's budget resources, such as meeting expenses and operating expenses, shall be used as intended by the budget and in accordance with legal requirements, and shall not be used for personal purposes.
- As a general rule, business expenses shall be paid with a Company card.
- In addition to the budget, all tangible and intangible assets, including Company supplies and facilities, shall be used for work-related purposes only. Ongoing efforts shall be made to protect assets by periodically reviewing asset classification and protection measures.
- Employee information (telephone numbers, email addresses, etc.) is also considered Company assets and shall not be used for personal purposes.

9. Principles concerning information protection

- Important or confidential Company information shall be strictly protected and controlled.
- Important information shall be relayed to the intended recipient immediately upon recognition.
- The falsification, concealment, or distortion of work-related information or the reporting or distribution of incorrect information shall be regarded as fabrication of information.
- Employees shall manage internal Company information acquired during the course of work according to the security level, and shall not use the information for personal purposes.

10. Fair trade regulations and building mutual trust with suppliers

- Employees shall comply with international standards and national laws and regulations concerning fair trade to ensure fair competition in domestic and international markets and refrain from engaging in unfair trade practices such as colluding with competitors regarding production, prices, bidding and market segmentation.
- Employees shall fulfill their social responsibility by refraining from using a position of power against a client or supplier to make demands or unlawful requests.
- Employees shall respect the rights and property of others, including intellectual property rights, and shall not infringe upon them to create business or generate profit.
- The information acquired from a supplier shall be strictly protected as stipulated in relevant laws and regulations and contract terms.
- Employees shall support suppliers to comply with laws and regulations concerning fair trade and ESG.

11. Principles concerning the Prevention of Conflicts of Interest

- "Conflict of interest" means a situation where a personal relationship with an employee of a supplier has an improper influence on an employee's work performance.
- Employees shall not engage in unfair trade practices such as signing unlawful private contracts, making high-price purchases, tunneling work, or leaking trade information to give preferential treatment to a certain individual or corporation.
- Employees shall prevent conflicts of interest by strictly denying improper requests from a supplier's employee with whom there is a personal connection, including former employees.
- Employees shall not make unofficial contact with a supplier's employee with whom there is a personal connection, and shall report any unintentional contact to the head of the department or the department in charge of ethical management.
- Employees shall not attend gatherings of former employees without the Company's approval.
- Where an employee has a personal connection to a supplier's employee, he/she shall consult the department head or ethics officer and adjust his/her duties and other matters accordingly.
- When the head of the department recognizes a work-related conflict of interest involving himself/herself or a staff member, he/she shall adjust the relevant duties or otherwise take action to avoid the conflict of interest. If it is impracticable to avoid the conflict of interest due to the nature of the work, he/she shall consult the department in charge of ethical management.
- Retired employees shall also prevent conflicts of interest with POSCO Holdings and its business entities.

12. Developing an organizational culture of human respect

- Employees shall not engage in verbal, physical, or visual behavior that may offend others, such as the use of profanities, verbal abuse, physical abuse, or sexual harassment that violates the human rights of an individual.
- Violations of human respect may be subject to disciplinary action in accordance with the relevant regulations.
- Employees shall respect each other's privacy and shall not slander or undermine others or disclose personal information.
- Employees shall comply with national labor laws and international standards, including working conditions for minors and minimum working age requirements.
- Safety rules shall be strictly observed, and any risks identified shall be addressed appropriately.

CHAPTER III. REPORTING UNETHICAL CONDUCT AND REWARDS AND SANCTIONS

1. Reporting Obligations and Confidentiality

- Employees who recognize the fact that he/she or someone else has violated the Code of Ethics or these Guidelines shall actively protect the Company and employees from unethical practices by reporting to or consulting the head of the department or the department in charge of ethical management as quickly and conveniently as possible. However, violations of human respect shall be reported to the department in charge of ethical management without delay.
- Executives and department heads shall report to and consult the department in charge of ethical management immediately upon being informed of a violation of the Code of Ethics by a staff member, and shall not downplay or conceal the incident.
- The department in charge of ethical management may conduct a fact check of the reported incident if necessary, and the employees concerned shall actively cooperate.
- Employees shall not take adverse action against, or disclose the identity of, an informant or whistleblower.
- Where it is likely that an informant or whistleblower may be subject to adverse action in terms of employment, a change of position or other personnel measures shall be taken if so desired by the informant.
- If an employee becomes aware of the fact that an incident has been reported, either by chance or during the course of work, he/she shall keep it confidential or face disciplinary action.

2. Rewards and Sanctions (Disciplinary Action)

- The Company shall firmly reprimand employees who violate the Code of Ethics and Practice Guidelines in accordance with the relevant regulations.
- The compensation criteria shall be in accordance with the guidelines on compensation and indemnity for informants of ethical misconduct and other relevant regulations.
- The Company shall firmly reprimand employees who violate the Code of Ethics or these Practice Guidelines in accordance with the relevant regulations.
- The Company may restrict Company access and business to employees who have been dismissed after violating the Code of Ethics.

3. Reporting of violations and protection of informants

- Employees who become aware of a violation of the Code of Ethics or these Practice Guidelines shall actively protect the Company and employees from the violation by reporting it to the head of the organization or department or the department in charge of ethical management for timely resolution.
- Employees shall not be subject to any disadvantage for filing legitimate whistleblowing reports.

Addendum

① Addendum: (Effective Date)
These Guidelines shall enter into force as of July 8, 2024.

② Standards of Interpretation
Matters not specified in the Code of Ethics Practice Guidelines or controversy over the interpretation of the Guidelines shall be interpreted and determined by the department in charge of ethical management.

③ Operation of the Ethics Committee
In order to report, deliberate, and decide important ethics related issues, Company can establish and operate Ethics Committee with separate operation standards.

④ Amendments
The department in charge of ethical management may amend the Code of Ethics when necessary.

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※ Applicable only to certain industries; not applicable to POSCO Holdings

Independent Practitioners' Limited Assurance Report

To the management of POSCO Holdings Inc. June 25, 2026

Conclusion

We have performed a limited assurance engagement on whether the below Sustainability Information in the Sustainability Report ("Report") of POSCO Holdings Inc. (the "Company") as of and for the year ended December 31, 2025 has been prepared in accordance with Criteria.

SMI	Period	Sustainability Report	Criteria
Global Reporting Initiative (GRI) Standards Index within the Report	As of and for the year ended 31 December, 2025	127p - 128p	GRI Standards (Global Reporting Initiative)
ESG Data within the ESG Factbook	As of and for the year ended 31 December, 2025	98p - 109p	POSCO group Index

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Company has not complied as of and for the year ended December 31, 2025, in all material respects, with Criteria.
Our conclusion on the SMI does not extend to any other information that accompanies or contains the SMI and our report.

Basis for conclusion

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) 'Assurance Engagements Other Than Audits or Reviews of Historical Financial Information', issued by the International Auditing and Assurance Standards Board (IAASB). Our responsibilities under this standard are further described in the "Our responsibilities" section of our report.
We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA).
Our firm applies International Standard on Quality Management (ISQM) 1 'Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements', issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.
We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Responsibilities for the SMI

Management of the Company is responsible for:
- designing, implementing and maintaining internal control relevant to the preparation of the SMI such that they are free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria for preparing the SMI and appropriately referring to or describing the criteria used; and
- preparing the SMI in accordance with the Criteria.

Inherent limitations

The preparation of sustainability information requires management to establish or interpret the applicable criteria, determine the relevance of information to be included, and develop estimates and assumptions that affect the reported information. Entities may apply different but acceptable interpretations, judgments, and estimations. Sustainability information includes details about the company's environmental, social, and governance (ESG) initiatives and goals, the anticipated future impact of events that have occurred or are expected to occur, and information regarding commitments and uncertainties. Actual results may differ significantly from management's current assessments, as events and circumstances often do not unfold as expected.

Our responsibilities

We are responsible for:
- planning and performing the engagement to obtain limited assurance about whether the SMI are free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the management.

Summary of the work we performed as the basis for our conclusion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the SMI that is sufficient and appropriate to provide a basis for our conclusion. Our procedures selected depended on our understanding of the SMI and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise. In carrying out our engagement, the procedures we performed primarily consisted of:
- Understand the systems and processes for managing and reporting the identified sustainability information
- Review of documentation and interview with the personnel regarding the risk assessment process and materiality assessment
- Interview with the person in charge of managing and reporting the identified sustainability information related to material issues
- Review of the underlying data for sustainability information related to material issues
- Perform inquiries and analytical reviews on the SMI
- Perform limited verification on the data related to the SMI
- Verify that the financial information presented in the report is consistent with the audited financial statements of the Company
- Assess whether the information presented in the report is consistent with our overall knowledge and experience of the Company's sustainability performance

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Seoul, Korea
June 25, 2026

KPMG Samjong Accounting Corp.

This report is effective as of June 25, 2026, the assurance report date. Certain subsequent events or circumstances, which may occur between the assurance report date and the time of reading this report, could have a material impact on the Company's Sustainability Report. Accordingly, the readers of the assurance report should understand that the above assurance report has not been updated to reflect the impact of such subsequent events or circumstances, if any.

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HOLDINGS